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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
DOCUMENT CONTROL

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IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996)))))))))))	Docket No. T-00000A-97-0238 AT&T COMMENTS ON SATE SUMMARY EVALUATION REPORT

AT&T Communications of the Mountain States, Inc. and TCG Phoenix, (collectively,

"AT&T") hereby file their comments on Hewlett-Packard's ("HP") SATE Summary Evaluation

Report for Qwest IMA-EDI SATE, version 2.0, dated December 3, 2001.[1]

I.   INTRODUCTION

The following analysis of SATE[2] is based on the details from the HP Report along with

past experience of AT&T's experts to reach conclusions about the current state of SATE. AT&T

agrees with most of the detailed comments and findings made by HP in its preliminary Report

but disagrees with many of HP's conclusions. In AT&T's opinion, the conclusions that HP has

reached with regard to the overall quality and "readiness" of SATE are not supported by the

detailed findings and comments presented in the HP Report.

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[1] A&T's first set of questions to HP is attached to AT&T's comments as Attachment A.
[2] "SATE" stands for stand-alone test environment.

II. ARGUMENTS

A. HP TESTING IS INCOMPLETE

It is quite clear from reading the HP Summary Evaluation Report that HP does not

consider the testing of SATE to be complete. HP identifies the Report as being preliminary.

"This document is the preliminary report for these areas and will be followed by a more detailed

final report, which is due to be delivered on December 20, 2001."[2] The Report is definitely a

preliminary one, as there are eleven categories of testing that HP has not completed. These

include:

1. Retesting of known problems.

There are approximately 27 formal issues that remain open.[3] The results of any retests or

review of new SATE documentation provided by Qwest must demonstrate that the issues are

fixed before they can be closed. There are a number of additional "questions" in the Open

Questions log that may require retesting if the questions cannot be properly addressed by Qwest.

In section 5.6.3 of the HP document, there are no less than 12 out of 24 "Results" that are

showing "I" for "Inconclusive – Re-test Required. More problematic, not all retesting may be

complete before issuance of the Final Report: "HP believes that Qwest's track record of

implementing corrective actions in a timely and effective manner indicates that most, if not all,

of the retests that will take place prior to issuance of the Final Report will be successful."[4] HP

has set a cutoff for retesting of December 14, 2001, so that results can be put into the Final

Report. There is a strong possibility that needed retesting will not be completed by that time.

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[2] SATE Summary Evaluation Report for Qwest IMA-EDI SATE, External Draft, Version 2.0, (Dec. 3, 2001), § 1.3.
[3] This number is constantly changing as issues are closed and new ones are open.
[4] *Id.*, § 2.1.3.

2.   **Review of updated documents.**

Qwest has been providing updated SATE documents in very rapid succession. HP has

not had the opportunity to thoroughly review them.

> *To the extent possible, and within the context of the project schedule,* HP evaluated the
> updated documents and reported its findings in this evaluation based upon the most
> current versions. If a document was not reviewed because it was replaced by an updated
> document, the document was logged as being received and closed with a status of 'not
> reviewed'. The documents received but not reviewed are listed below.[5]

3.   **New Release Testing**

One important facet of SATE is the ability of a competitive local exchange carrier

("CLEC") to evaluate the interaction of its systems with a new IMA-EDI software release. One

of the objectives of SATE is to allow CLECs to do this type of testing 30 days before a new

software version is released. HP was not able to test a SATE release of the new software 30 days

before the release of the IMA-EDI official release. "However, due to the limited nature of the

changes involved in IMA SATE release 8.01, HP is not able to fully verify that the SATE is

adequate for full release testing."[6] HP makes the following recommendations that Qwest

complete with respect to new release testing:

6.   Qwest develop a formal process by which the SATE will be available for new
      release testing on an ongoing basis. Qwest should invite ACC oversight of this
      function.

7.   To ensure that the SATE is adequate for full release testing, HP recommends that
      IMA SATE release 9.0 be tested. This release is expected to take place February
      2002.[7]

HP further expands on this issue in a section on New Release Testing, explaining why testing a

point release is inadequate. HP was only able to test a point release, not a full release of IMA-

EDI:

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[5] *Id.,* §3.3 (emphasis added).
[6] *Id.,* § 2.1.6.
[7] *Id.,* § 2.2.

By Qwest's definition of a Point release this did not meet the expectations of a new IMA-EDI release implementation. A Point Release does not normally affect the IMA-EDI or Business Process Layer.[8]

4.   Add Products/Activities to SATE.

SATE does not currently encompass all of the products that a CLEC may order through the IMA-EDI production interface. HP requests that Qwest add a new type of product to SATE. HP has not had the opportunity to test this added product type in SATE.

> HP has requested that Qwest add the Unbundled Distribution Loop product to SATE. In the most recent Data Document distribution v7.09 and v8.07 on 11/28/01, Qwest has added the UDL and UDLNP products and their associated test scenarios. HP is in the process of preparing for the evaluation of all of the UDL scenarios for both IMA EDI release 7.0 and 8.0. This evaluation will be completed and presented in the Final Report.[9]

5.   Constant changes are being made to SATE during testing.

Qwest has been making constant patches to SATE to repair problems found by HP during testing. HP has not had the opportunity to review all of these changes and their impact on other aspects of SATE. HP states that: "As HP performed the transaction test evaluation there were continual changes made to the test bed scenarios and account data provided in the SATE."[10] This type of environment is not conducive for good testing, especially given the artificial deadlines for test completion.

6.   Lack of full regression testing.

Due to the many changes and the constant patching to the SATE system, there is a need for a full regression testing of SATE. HP agrees with this view:

> **Full Regression Testing** - The purpose of Full Regression Testing is a quality assurance test based on the multiple changes that HP requested during the aforementioned evaluation methods. HP is executing each scenario supplied in the SATE as documented in the v7.8 and v8.6. The outcome of each transaction will be balanced to the expected

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[8] *Id.*, § 5.2.1.
[9] *Id.*
[10] *Id.*, § 5.4.

result listed in the respective Data Document. All variances will be reported to Qwest. The results of this test will be made available in the Final Report.[11]

7. **Lack of testing for back office legacy system edits and error codes.**

SATE uses a simulation of the back office legacy systems for SATE. It is clear that

Qwest has not incorporated all of the legacy system edits and error codes, and what has not been

provided cannot be tested. The need for the implementation of legacy system edits and error

codes will be addressed later in this document.

> Additionally it should be noted that HP could not test back-office legacy system edits to ensure this 8% error rate does not increase due to the generation of errors that were unable to be detected during SATE Progression or Regression testing.[12]

8. **Discrepancies in Multiple Release Testing.**

HP has discovered some inconsistencies between the two releases it has tested. This

issue must be fully explored before testing can be considered complete:

> HP has noted discrepancies in responses during multiple release testing. HP has results that show the same scenario to produce different outcomes when comparing the results of 7.0 to the results of 8.0. HP is currently investigating the extent of this issue. These results will be provided in the Final Report.[13]

9. **Volume capacity testing.**

Qwest has not tested SATE for any type of volume. It is unknown how SATE would

handle multiple CLECs and interface developers at once. "HP did not perform volume capacity

testing."[14]

10. **Functions that are not yet available.**

There are additional functions that need to be added to SATE, some of which are already

planned. The current testing does not encompass them.

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[11] *Id.*
[12] *Id.*, § 5.6.3(5).
[13] *Id.*, § 5.6.3(6).
[14] *Id.*, § 5.6.4(2).

11.   **Tariff-based USOC and Geography edits.**

Qwest is assuming a general type of CLEC without any state tariffed-based USOCs or

geographical edits, which would occur in the production environment.

> Co-Provider tariff based USOC and Geography edits are not applied to the Co-Provider's
> view of SATE as they would exist in production. The whole Qwest universe of valid
> USOCs and Services is made available to the tester.[15]

12.   **Interviews with CLECs.**

HP has not started the interviews with CLECs. Such interviews were contemplated in the

original evaluation plan.

> Due to time constraints, interviews with CLECs and Qwest were not conducted at the
> time this report was published. The summary presented below is not complete at this
> time, as HP continues to analyze the results, and plan for follow-on interviews.[16]

In summary, the current evaluation report is admittedly incomplete for numerous reasons.

In addition, it is very unclear in AT&T's view, whether the testing can be completed by

December 20, 2001, the date the Final Report is to be released by HP. In fact, it is more realistic

to move the testing completion target date to 14 days after the release of SATE 9.0 so that

complete testing for a new release can be completed. This would give time for many of the other

aspects of the test to be completed as well.

B.   **THE SATE FUNCTIONALITY IS NOT ADEQUATE**

In developing SATE, Qwest appears to have made some compromise on what would be

useful for CLECs and what was easy to develop. HP noted that Qwest did not consult the

CLECs before designing SATE.[17] The result is that SATE will not allow the complete range of

products and features to be tested for ordering as does the production system, nor does SATE

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[15] *Id.*, § 5.6.5(1).
[16] *Id.*, § 6.3.
[17] *Id.* "However, Qwest obtained little direct input from CLEC community."

receive orders and respond back in the same time frame or the same manner as the production system. HP recognizes these inadequacies in its preliminary report.

1. Lack of Products That are Supported by SATE.

HP recommends that: "Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies."[18] Later, in this same section, "HP also recommends that Qwest obtain input from the CLECS to determine the full suite of products that shall be included in the SATE.[19] In the matrix entitled "Overall Transaction Test Evaluation Findings Summary," HP further clarifies the lack of completeness of SATE:

> Are the scenarios supported in the SATE inclusive of the products and activities that are required to support the business processes of a CLEC operations center?
>
> This **Inconclusive** result is based on the most recently delivered SATE Data Documents. All products are not offered in SATE when compared to the products found available in the IMA EDI Network Disclosure documentation. HP recommends that Qwest obtain input from CLECs to determine the full suite of products that shall be included in SATE.[20]

CLECs need all of the products and features that can be ordered using the production system to be available in SATE. DSL, Line Sharing and other important products are currently not covered.

2. Manual Post-Order Processing.

SATE uses manual processing for post-order activity such as order confirmations ("FOC"), completion notices, and other functions. Qwest plans to add these functions in an automated fashion by adding the VICKI capability to SATE in the first quarter of 2002. The current manual process is unlike that which is experienced in the production environment:

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[18] *Id.*, § 2.2(1).
[19] *Id.*, § 2.2(5).
[20] *Id.*, § 5.6.3(7)

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The existing SATE response process does not make consideration to the automated process known as "VICKI" which is to be Implemented into SATE in January.[21]

The lack of automation for post order processing will impact CLEC OSS development. "Back office system integration is not available so HP cannot conclude that the results in SATE will be the expected results in Production."[22] Lack of automation for post order processing also constrains the number of LSR responses that a CLEC can expect in a day. Without VICKI, this number is currently ten per day.

3. Lack of flow through.

SATE does not flow through orders in the way that the production system does. Flow through is a very important part of the OSS interface because orders that flow through result in service orders that avoid manual processing by Qwest representatives. SATE does not provide this type of interface; subsequently, it does not give the CLEC any idea how its test orders would flow through in production. HP has commented on this problem: "Back office system integration is not available so HP cannot conclude that the results in SATE will be the expected results in Production."[23] The OBF has stated that the response times should be the same in test system as in the production system:

> Provided a customer uses the same connectivity option as it uses in production, the customer should, in general, experience response times similar to production.[24]

Until Qwest implements flow through and VICKI capabilities in SATE, this requirement will not have been met.

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[21] *Id.*, § 5.6.3(8).
[22] *Id.*, § 5.6.5(2).
[23] *Id.*
[24] ATIS/OBF Change Management Process; OBF 2233a2v2.

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C.   TESTING IS SHOWING HIGH RATES OF PROBLEMS

The transaction testing results clearly show that the initial versions of SATE that HP tested were extremely problematic and that many problems still remain in SATE. Testing of SATE 7.0 had an initial error rate of 25%, and 9% of transactions have still not passed.[25] SATE 8.0 had an initial failure rate of 23%, and 14% of those have yet to pass retesting.[26] In negative testing of SATE 7.0, the error rate was 17%, with all of them outstanding. In negative testing of SATE 8.0, 18% were in error, and only 17% of those have been successfully retested.[27] These are very high rates of error and signify a system that is still under development and cannot be relied upon for consistency or accuracy by CLECs. Most of these problems are rated as medium severity.[28] HP found the following types of errors:

- Invalid test data

- Outcome of scenarios incorrect

- Business rules for SATE not consistent with the production environment

- Production error messages can not be reproduced or reproduced inaccurately

- Results of SATE scenarios do not match with results of production

E.   ACCURACY AND CONSISTENCY OF TEST RESPONSES

HP is finding numerous errors and problems with SATE during testing. There are currently approximately 27 formal open issues and numerous issues on the Question Log that may turn into additional formal open issues. Most of these problems have to do with the accuracy of SATE. HP's report makes the following comment with respect to this issue:

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[25] SATE Summary Evaluation Report, §§ 2.1.3 and 5.5.

[26] *Id.*, § 5.5.

[27] *Id.*

[28] The criteria for high severity have been set so stringently that AT&T does not expect any software error to be assigned a high severity.

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However, HP found noteworthy discrepancies related to business rule consistency between the SATE and production systems.[29]

> *Further results indicate that there may be inconsistencies between the edits employed in the SATE and Production BPL for a specific IMA EDI Implementation.*[30]

These types of errors are particularly troubling as they prevent a CLEC from assuring that their OSS will work well in a production environment -- the fundamental principal upon which SATE rests. HP has the same concern:

> HP noted that there is inconsistent data content in responses from SATE as compared to those of interoperability and Production for like LSRs, and that this situation may negatively impact the CLEC. The CLEC may not be able to develop and test their business processes based on their LSR Interoperability testing while using the IMA EDI SATE.[31]

F.   INADEQUATE PROCESSES AND SUPPORT

One of the critical aspects of SATE is the processes and support Qwest puts behind the system. Qwest must have processes to maintain and improve SATE and support staff to manage and maintain the system. HP had a number of issues with the way in which Qwest was supporting SATE and the processes that were in place, or are lacking. Qwest has not yet developed the processes necessary to support SATE. In its evaluation of the SATE program, HP observed a number of process problems and had a number of recommendations for the processes that support SATE.

1.   No Quality Assurance Plan for documentation.

There is currently no quality assurance plan or release management practice specifically for SATE documentation. HP recommended "Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation."[32]

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[29] *Id.*, § 2.1.
[30] *Id.*, § 5.6.3(2).
[31] *Id.* § 3.5.1.
[32] *Id.*, § 2.2(2).

2. **No definition of Roles and Responsibilities for individuals and organizations.**

There are currently no published roles and responsibilities for individuals and

organizations involved in SATE. HP makes the following observation:

> Functional roles have not been identified at the individual activity level. The only roles
> identified are at the organizational entity level (i.e., Qwest and CLEC).[33]

HP recommends:

> That Qwest clearly and specifically identify the roles and responsibilities of each
> individual and organization involved in the SATE. This definition of roles and
> responsibilities should include goals and objectives and mission statements for each
> organization and for all personnel. In addition, the job description for each employee
> should be clearly defined.[34]

3. **No internal controls to insure accountability.**

HP notes that there was a lack of definition associated with accountability for

implementation and testing activities:

> Accountability for the completion of key SATE implementation and testing activities is
> not consistently defined (i.e., deliverable descriptions, responsible parties clearly
> identified and time frames established).[35]

Qwest must put in place internal controls to ensure accountability for organizations and

individuals involved in SATE. HP recommends:

> That Qwest develop a system of internal controls to ensure accountability for
> organizations and individuals involved in the SATE process. These controls should
> use clearly defined goals and objectives and should tie specifically to functional
> responsibility, such as quality of documentation, accuracy of test account data, mirror
> image of production, etc. Employees involved in the SATE should be encouraged to
> accomplish these goals and objectives.[36]

4. **No process flow documentation.**

Qwest has not yet developed process flow documentation that would be a guide to

CLECs in using SATE. HP notes that:

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[33] *Id.*, § 4.5.
[34] *Id.*, § 2.2(3).
[35] *Id.*, § 4.5.
[36] *Id.*, § 2.2(3).

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Process flows are not documented in a thorough and consistent fashion. This problem is magnified by the fact that SATE related activities are interwoven with the activities related to other EDI applications in the EDI Implementation Guide. Additionally, process activities are not always presented chronologically.

- Although activity inputs and outputs are often implied, generally they are not defined clearly enough to ensure understandability by CLECs. Therefore they were evaluated as "Partially Compliant" across all SATE processes.

- Quantifiable process performance objectives are not clearly documented.[37]

HP recommends:

That Qwest develop process flow documentation that accurately reflects actual SATE processes and is a reliable guide to CLECs using the SATE. [38]

HP further recommends that:

Document process flows for key activities performed by both Qwest and CLECs. This documentation should illustrate the order in which the activities are performed, identify the roles that perform them, and provide a clear activity description including inputs/outputs.[39]

5.   **Qwest has not yet incorporated SATE within the CMP.**

Qwest has not yet integrated SATE within the CMP for changes. HP recommends that:

Qwest formally incorporate the SATE into the CMP process, and future changes and modifications should be subject to that process and that Qwest develop a permanent, formalized method of obtaining CLEC input and identifying current and future SATE requirements in connection with the CMP process. This process should proactively seek CLEC evaluation of the SATE process, suggestions for improvement, and forecasts for testing requirements. HP also recommends that Qwest obtain input from the CLECS to determine the full suite of products that shall be included in the SATE.[40]

6.   **No Process for SATE use in new release testing.**

Qwest has also not yet formalized the process whereby SATE can be used by CLECs

before a production release is in effect.[41] This is a critical application for SATE, and Qwest must

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[37] *Id.*, § 4.5.
[38] *Id.*, § 2.2(3).
[39] *Id.*, § 4.5.
[40] *Id.*, § 2.2(5).
[41] This is a requirement of the Federal Communications Commission. *Bell Atlantic New York Order*, ¶ 109.

formalize this process. HP recommends that "Qwest develop a formal process by which the

SATE will be available for new release testing on an ongoing basis. Qwest should invite ACC

oversight of this function."[42]

7. No Process Objectives or Measurements.

Qwest has not yet developed process objectives or measurements. Before these are

developed, it is not possible to fully evaluate Qwest's current operations or their planned support

for SATE. HP remarks that "Quantifiable process performance objectives are not clearly

documented."[43]

HP also states that:

Process performance was not measured against clearly established process objectives for
time, cost or quality. With the exception of transaction testing, there was no evidence of
clearly defined process measurements or objectives.[44]

8. Ongoing Support Cannot Be Verified.

The CLECs have no assurance that Qwest will provide ongoing support for SATE in

terms of the personnel necessary to work with CLECs during testing. HP has not yet evaluated

Qwest's technical support for SATE, as Qwest has not established guidelines that can be used.

Technical Support for CLECs was not fully evaluated. This is due to the lack of a
standard set of tech support guidelines or procedures (there is no documentation that
indicates the existence of a technical support process).[45]

9. Lack of Qwest Staff Support for reasonable operational hours.

Qwest support for SATE does not provide support until 8:00 AM. This does not give a

company such as AT&T, which has much of its OSS development on the East Coast, enough

time in the day to do adequate testing. HP notes this problem:

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[42] *Id.*, § 2.2(6).
[43] *Id.*, § 4.5.
[44] *Id.*, § 4.3.
[45] *Id.*, § 4.3.

It has been noted that the eastern time zone cannot utilize the SATE until 10:00 am. It may be advisable for Qwest to consider extended hours of availability to accommodate multiple time zones.[46]

G.   SATE DOCUMENTATION IS DEFICIENT

1.   Documentation is New and Incomplete, Requiring Qwest support.

The documentation that Qwest is providing for SATE is very new and incomplete,

requiring HP to frequently call Qwest staff for clarification and interpretation:

> However, much of the SATE documentation reviewed in this evaluation was newly developed and required support from Qwest SATE personnel to allow HP to properly use the SATE environment.[47]

2.   Poor Version Control.

HP also notes inaccuracies throughout the documentation, likely caused by the rush with

which it was prepared. HP is essentially proofing the documentation for Qwest and helping to

define areas where additional explanation is needed:

> In addition, the SATE documentation contained numerous, relatively minor inaccuracies that HP believes are the result of hasty preparation and **poor version control.**[48]

Qwest can easily fix minor inaccuracies. However, poor version control is a more challenging

problem that Qwest must address. To address this concern, HP makes the following

recommendation:

> Therefore, HP recommends that Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation.[49]

3.   Documents Found Unsatisfactory.

HP finds the following SATE documents Unsatisfactory for Completeness and Clarity:

- IMA EDI Implementation Guide v6.0
- IMA EDI Data Document for SATE

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[46] *Id.*, § 5.6.3(7).
[47] *Id.*, § 2.1.1.
[48] *Id.* (emphasis added).
[49] *Id.*, § 3.4.

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- IMA EDI Data Request Form
- IMA EDI 7.07 Data Document for SATE
- IMA EDI 8.05 Data Document for SATE[50]

Specifically, HP finds that several of these documents did not contain the level of detail
necessary. These documents must be expanded to provide completeness and socialized with HP
and CLECs to test for clarity.

H. SIMULATION OF LEGACY SYSTEMS

The most troubling aspect of the current implementation of SATE is the fact that SATE
simulates, but does not mirror, the back end legacy systems. SATE uses a copy of the IMA-EDI
interface, but uses a simulation of the legacy systems that provide the actual order processing and
response. Qwest has called this simulation a "stubbing" system, an analogy from cable systems
where a branch cable may be "stubbed" instead of going to the actual destination. SATE uses a
software simulation of the legacy systems with built in "canned" data that simulates CSR and
facility information. The challenge with a simulation is to assure that the simulation captures all
of the necessary functions of the functioning legacy systems, and to make sure that the functions
that are captured are accurately simulated. CLECs will be depending on SATE for accurate
representations of order and response activity that the CLEC OSS would see when working with
the production systems.

Other ILECs, such as BellSouth, chose approaches that actually use the legacy systems as
part of the test environment. However, a good simulator can be used as a test environment.
AT&T's concern is that SATE, which has been put together very quickly, does not adequately
represent the legacy systems. There are two aspects that must be evaluated. First, the simulator
must correctly handle all of the correct inputs that it is given. This means that SATE should give

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[50] *Id.*

correct responses to orders that are correctly submitted. Second, the simulator must correctly

handle all of the incorrect inputs that can reasonably be given to the system. This means that

SATE should give the correct responses, in the form of error messages, to orders that are

incorrectly submitted.

The HP evaluation of correctly handled inputs has proceeded at a good pace and is still in

progress, finding errors as described above. However, HP has had difficulty in evaluating the

effect of the responses of SATE to incorrect inputs. Qwest waited until December 6, 2001, to

provide Qwest and the CLECs with a complete list of error codes for the Business Process Layer

("BPL"). It is unclear how many of the BPL error messages HP has tested. Qwest has so far

refused to provide HP, or the CLECs, with a list of error messages that could come from the

legacy systems. With a list of error messages that the legacy systems would send back to a

CLEC, HP could run additional negative tests to see if SATE correctly generates the errors when

given particular inputs. Testing is incomplete until this has been done, as well as assuring that

all BPL error codes have been tested. Further, until this testing is done, there is no assurance that

SATE adequately models the legacy systems.

HP recognizes the importance of evaluating SATE's simulation of back end systems:

> The impact of the SATE's simulation of back-end systems, is that Qwest has an
> additional responsibility to ensure the synchronization of SATE test results to make
> certain that CLECs receive responses to transactions that are indeed the same responses
> that would be received from production systems. This is particularly important if test
> transactions produce behavior that is different than production systems, as the nature of
> the behavior cannot be anticipated and planned for in advance. Management of a test
> environment of this type requires the involvement of knowledgeable personnel who can
> evaluate orders submitted and ensure that the CLEC receives a response that mirrors
> production. It also requires adequate resources and careful planning to ensure
> scalability.[51]

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[51] *Id.*, § 2.0.

HP is also concerned that the testing of the back end legacy systems simulation may not be adequate:

> The result of **Inconclusive** is due to the percentage of unexpected outcomes as a result of the transaction testing overall. Additionally it should be noted that there were responses received that had differences in the "content" when compared to the Production Error List. The "comprehensive" criteria has been challenged due to the return of lengthy technical messages which have been explained by Qwest as "Back Office Legacy System" messages. HP has inquired as to where the documentation would be found to explain the back office legacy system messages. Qwest is investigating.[52]

> The **Inconclusive** ratings are the result of the need for further clarification regarding the publication of the Production Error List and the Error List's association to the SATE. It became evident that there are Legacy system edits which cause error responses to be generated. These Legacy system error messages are not incorporated into the Production Error list, nor are they part of any published SATE documentation.[53]

HP then makes the following statement, as a kind of "buyer beware" warning regarding the limitation of SATE:

> Back office system integration is not available so HP cannot conclude that the results in SATE will be the expected results in Production.[54]

III.   SUMMARY

The HP testing and analysis is not yet complete, and should not be completed on the current schedule. The testing of SATE to date has been at breakneck speed. HP should do a thorough retest of a SATE point release after all currently known problems have been fixed. HP recommends, and AT&T concurs, that SATE 9.0 should be thoroughly tested. This would be the first test of SATE in a true progression testing mode. SATE 9.0 is also scheduled to have VICKI capability for post order processing. SATE 9.0 is due for deployment in late January 2002. In addition, significant pieces of SATE are yet to be developed and cannot be tested until they are developed.

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[52] *Id.*, § 5.6.3(8).
[53] *Id.*, § 5.6.3(2).
[54] *Id.*, § 5.6.5(2).

SATE is not a production-ready system. The current SATE implementation is, at best, a beta test version that CLECs should use with caution. There are still inconsistencies between SATE and the production system that would give CLECs incorrect results. More troubling is the fact that legacy system edits and error messages have not been thoroughly tested. The implication of this is that the responses of SATE cannot be verified as accurate, inaccurate, or not existent. The fact that several CLECs have been using SATE is not persuasive. They are using a flawed and incomplete system and should be cautious of designing their systems to it. HP has not represented the CLEC user experience in its Report. This is like a patient using a new drug before the FDA has thoroughly reviewed and approved it. Although the symptoms may be treated, the side effects are unknown and may be devastating. Testing should continue on SATE even though some CLECs may choose to use it, just as with the production system.
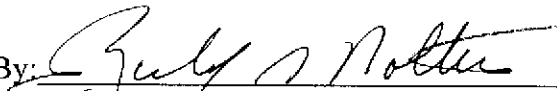
In conclusion, all of the recommendations made by HP should be implemented before the Arizona Corporation Commission concludes that SATE is certifiable. Further, AT&T makes the following recommendations that should also be implemented before making any decision:

1. SATE should be tested against the complete list of legacy system error messages,

2. SATE should be updated to all common error situations of the legacy systems,

3. SATE should be retested after new error messages have been programmed,

4. VICKI enhancement for post order processing should be implemented and tested,

5. Additional commonly used products in SATE such as Line Splitting and Loop Splitting should be implemented and tested, and

6. Flow through capability for SATE should be implemented and tested.

Until these recommendations are adopted and implemented, the Commission cannot find that SATE mirrors the production environment.

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Respectfully submitted this 7th day of December, 2001.

AT&T COMMUNICATIONS
OF THE MOUNTAIN STATES, INC.
AND TCG PHOENIX

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Attachment A

Qwest 271 OSS Test Workshop Questions

Date Submitted: December 7, 2001

Question Number	Submitter (AT&T)	Interim Report (e.g. Retail Parity, Rel Mgmt, etc.)	Report Section Reference	Questions to HP
1.	AT&T	HP SATE Report	2.0	What input did Qwest receive from CLECs regarding the initial design of SATE and the features that are included?
2.	AT&T	HP SATE Report	2.1	What are the noteworthy discrepancies related to business rule consistency between the SATE and production systems?
3.		HP SATE Report	2.1.1	Please identify and explain the problems HP found with Qwest's version control for documentation
4.		HP SATE Report	2.2	How long would it take HP to test SATE release 9.0 after it is provided in late January?
5.	AT&T	HP SATE Report	2.2	What would be involved in Qwest providing a list of variances between SATE and production business edits?
6.	AT&T	HP SATE Report	3.4	Using the table provided in section 3.4, please describe the problems found with each document for each box that is labeled Unsatisfactory or Unsatisfactory with note reference.
7.	AT&T	HP SATE Report	4.2	HP makes the statement: "However, it is noteworthy that their completion was based heavily on the interaction of Qwest and CLEC test team members rather than on the process documentation itself." Please explain what is meant by this statement, giving several examples.
8.	AT&T	HP SATE Report	4.4	HP makes the statement: IMA-EDI SATE Process is not documented to a degree of detail and clarity to reasonably support: ease of understanding by CLECs, and consistent repeatability. Please explain this statement and describe what Qwest must do to remedy the situation.
9.	AT&T	HP SATE Report	4.5.1	What does Qwest need to do to consistently define the accountability for the completion of key SATE implementation and testing activities?
10.	AT&T	HP SATE Report	4.5.1	What does Qwest need to do to document the process flows in a thorough and consistent fashion?
11.	AT&T	HP SATE Report	5.2.1	Please describe HP's process in developing negative testing scenarios, including the error code list that was used.
12.	AT&T	HP SATE Report	5.2.1	How many BPL error codes were tested in the negative testing scenarios? How many total BPL error codes exist?
13.	AT&T	HP SATE Report	5.2.1	If some BPL error codes were not tested, please describe all of the reasons that they were not tested.
14.	AT&T	HP SATE	5.2.1	Did HP test for Legacy system error messages during negative testing?

Date Submitted: December 7, 2001

Question Number	Submitter (AT&T)	Interim Report (e.g. Retail Parity, Rel Mgmt, etc.)	Report Section Reference	Questions to HP
15.	AT&T	HP SATE Report	5.2.1	Has HP received a complete list of Legacy system error codes from Qwest? If so, when was it received?
16.	AT&T	HP SATE Report	5.2.1	How many negative testing scenarios were directed at testing error messages from Legacy systems?
17.	AT&T	HP SATE Report	5.2.1	What were the limitations and variances that HP feels constrained Production Mirror Testing for SATE?
18.	AT&T	HP SATE Report	5.2.1	Given additional testing time, how would you extend Production Mirror Testing?
19.	AT&T	HP SATE Report	5.2.1	Was HP able to complete the New Release Testing module?
20.	AT&T	HP SATE Report	5.2.1	What are the reasons that make it important to test SATE 9.0 as the first full instance of New Release Testing?
21.	AT&T	HP SATE Report	5.2.1	When will HP complete the Add Products/Activities to SATE test module, including all retesting? Will this be in time for the Final Report?
22.	AT&T	HP SATE Report	5.2.1 and 5.6.4	What capacity testing did HP do on SATE? What additional capacity testing should be done?
23.	AT&T	HP SATE Report	5.2.2	What features that CLECs can use on the production system are not available on SATE and therefore not tested?
24.	AT&T	HP SATE Report	5.2.2	What products can CLECs order on the production systems that are not available on SATE?
25.	AT&T	HP SATE Report	5.4	What was the impact of the extremely compressed testing schedule on the quality of testing?
26.	AT&T	HP SATE Report	5.4	What additional testing would HP have done if they had been given additional time?
27.	AT&T	HP SATE Report	5.4	What was the impact to the testing of the constant changes that Qwest was making to SATE?
28.	AT&T	HP SATE Report	5.6.3	What are the five most troubling problems or issues that HP has found with SATE that have still not been fixed? Please give a description of each trouble or issue.

Date Submitted: December 7, 2001

Question Number	Submitter (AT&T)	Interim Report (e.g. Retail Parity, Rel Mgmt, etc.)	Report Section Reference	Questions to HP
29.	AT&T	HP SATE Report	5.6.4	What flow through functions were tested with SATE?
30.	AT&T	HP SATE Report	5.6.4	What flow through functions should be tested with SATE?
31.	AT&T	HP SATE Report	5.6.4	In what ways would the errors that exist in SATE impact a CLEC that is developing their OSS interface?
32.	AT&T	HP SATE Report	5.6.4	In what ways would the lack of testing of legacy system edits and error messages impact a CLEC that is developing their OSS interface?
33.	AT&T	HP SATE Report	5.6.5	In what ways would the lack of USOC and Geography-based edits impact a CLEC that is developing their OSS and interfaces to Qwest?
34.	AT&T	HP SATE Report	5.6.5	HP states that: Back office system integration is not available so HP cannot conclude tht the results in SATE will be the expected results in Production. Please explain what is meant by this and what is the impact on CLECs who are developing and testing OSS.
35.	AT&T	HP SATE Report	6.0	What particular issues and differences of opinion were brought out in the CLEC surveys?
36.	AT&T	HP SATE Report	7.4	In recommendation # 1, what products and new technology should be added to SATE that are not currently included?
37.	AT&T	HP SATE Report	7.4	In recommendation # 3, what are the essential roles and responsibilities that Qwest needs to have in place to assure that SATE will be well managed and maintained by Qwest into the future?
38.	AT&T	HP SATE Report	7.4	In recommendation # 4, HP points out the need for a list of variances between SATE and the production business edits. How many exceptions would HP view as acceptable between the two platforms? Said another way, at what point should Qwest augment SATE to eliminate exceptions.
39.	AT&T	HP SATE Report	7.4	How many days of testing will be required to fully test SATE 9.0?
40.	AT&T	HP SATE Report	7.4	In a SATE performance standard, how many medium severity errors should be tolerated? How many low severity errors?
41.	AT&T	HP SATE Report	7.4	In recommendation # 4, shouldn't the list of variances include error codes and error messages that the CLEC will receive as well as edits?

Attachment A
Qwest 271 OSS Test Workshop Questions

Date Submitted: December 7, 2001

Question Number	Submitter (AT&T)	Interim Report (e.g. Retail Parity, Rel Mgmt,etc.)	Report Section Reference	Questions to HP
42.	AT&T	HP SATE Report	General	HP has stated that it must cutoff testing on December 14 to finish the Final Report. Will all testing and retesting be completed by the date that HP has stated it will cutoff further testing.
43.	AT&T	HP SATE Report	General	Test plans were issued on the same day as the Preliminary Report. How much of the test plans were completed when testing started?
44.	AT&T	HP SATE Report		How much change was there in the test plans during testing?

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
  Chairman
JAMES M. IRVIN
  Commissioner
MARC SPITZER
  Commissioner

IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996	))))) Docket No. T-00000A-97-0238

AT&T'S COMMENTS ON QWEST'S BRIEF AND STATUS REPORT REGARDING CHANGE MANAGEMENT

AT&T Communications of the Mountain States, Inc. and AT&T Local Services on behalf of TCG Phoenix, (collectively, "AT&T") hereby submit their Comments on Qwest's Brief and Status Report Regarding Change Management ("Brief and Status Report").

I.   BACKGROUND

On October 29, 2001, AT&T filed Comments on Qwest's Status Report Regarding the Change Management Process Redesign ("October Comments"). AT&T's October Comments described the background for the Qwest Change Management Process ("CMP") Redesign and the filing of Qwest's status reports. In addition, AT&T pointed out that the majority of the "CM" issues identified by Qwest in its status report were unresolved. Moreover, AT&T identified a number of issues that Qwest still needs to address. To date, Qwest has not responded to AT&T's October Comments. The issues described in AT&T's October Comments must still be addressed by Qwest, as they have not been addressed by Qwest's Brief and Status Report.

II. STATUTORY FRAMEWORK

The FCC, in recent orders evaluating a Bell operating company's ("BOCs") compliance with section 271, has attached an appendix describing the statutory requirements that must be met for approval of a section 271 application. For example, in its recent order approving SBC Communications, Inc.'s section 271 application for Arkansas and Missouri, this analysis is contained in Appendix D.[1]

A BOC must provide nondiscriminatory access to its operations support systems ("OSS") as part of its demonstration of compliance with checklist item 2.

> By showing that it adequately assists competing carriers to use available OSS functions, a BOC provides evidence that it offers an efficient competitor a meaningful opportunity to compete. As part of this demonstration, the Commission will give substantial consideration to the existence of an adequate change management process and evidence that the BOC adhered to this process over time.

> •   •   •

> In evaluating whether a BOC's change management plan affords an efficient competitor a meaningful opportunity to compete, the Commission first assesses whether the plan is adequate. In making this determination, it assesses whether the evidence demonstrates: (1) that information relating to the change management process is clearly organized and readily accessible to competing carriers; (2) that competing carriers had substantial input in the design and continued operation of the change management process; (3) that the change management plan defines a procedure for the timely resolution of change management disputes; (4) the availability of a stable testing environment that mirrors production; and (5) the efficacy of the applications to determine whether competitive carriers are able to combine network elements as required by the Act and the Commission's regulations.[2]

When evaluating Qwest's CMP, the Commission should, at a minimum, use the assessment as described by the FCC.

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[1] *Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Arkansas and Missouri*, CC Docket No. 01-194, Memorandum Opinion and Order, FCC 01-338 (rel. Nov. 16, 2001).

[2] *Id.*, Appendix D, at 20-23 (footnotes omitted).

III. INTRODUCTION

At a high level, Qwest's Brief and Status Report makes the following points:

 (i)   Qwest's "<u>current</u> change management process satisfies each of the factors considered by the Federal Communications Commission ("FCC") in evaluating Checklist Item 2 compliance"[3];

 (ii)   All of the systems issues have been resolved, that interim procedures for product and process have been established and that Qwest has implemented everything agreed to[4]; and

 (iii) CMP redesign continues and many of the eighteen "CM" identified in the Brief and Status Report remain open.

As discussed below, AT&T disagrees with items (i) and (ii) above. In addition, the fact that item (iii) above is part of Qwest's Brief and Status Report is wholly inconsistent with items (i) and (ii). AT&T believes that CMP Redesign needs to continue, that CMP continues to function poorly, and that many issues remain outstanding for both systems and product/process. Qwest cannot be found to be in compliance with its section 271 obligations relating to change management until the CMP Redesign is complete, Qwest has effectively implemented the redesigned process and Qwest's adherence to the redesigned CMP is evaluated favorably by an independent third party.[5] The Arizona workshop scheduled to discuss CMP should be useful in *reporting* to the Commission the status of redesign, but it is premature to determine that Qwest's CMP is compliant with law.

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[3] Brief and Status Report, at 1 (emphasis added). *See also*, Brief and Status Report, at 17.

[4] *Id.*, at 6, 7, 9 and 14

[5] AT&T reviewed the attendance record from the CMP Redesign Meetings and found that, from July 11 through November 13, 2001, there were seventeen days of CMP Redesign meetings and Cap Gemini Ernst & Young called into only three days (September 5, October 31 and November 13). AT&T does not know if CGE&Y stayed on the line for the entire time on each of the three days it called in. It appears that the redesign of CMP is not undergoing a meaningful review by a third party at this time.

IV. COMMENTS

Qwest's Brief and Status Report describes the positive aspects of the CMP Redesign process. It points to the many meetings that have been held, to the significant commitment made by competitive local exchange carriers ("CLECs") to participate in this process, and it addresses areas where progress has been made. However, the Brief and Status Report fails to identify several significant issues that CLECs and Qwest have been discussing for several weeks without resolution. These are issues that impact whether CLECs have a meaningful opportunity to participate in change management and whether CLECs are on an equal footing with Qwest in the CMP. In addition, Qwest fails to describe the magnitude of the issues that have been identified by the parties relating to all areas of CMP that have yet to be addressed.

A. Qwest's "Current" Change Management Process is Not Clear

In the Brief and Status Report, Qwest states that its "current" change management process meets the FCC's requirements. To evaluate this assertion one must identify where Qwest's current CMP actually resides. This has been the subject of discussions in CMP redesign meetings and is not self-evident.[6] On the one hand, there is the CMP that existed prior to the commencement of the CMP Redesign process, which is documented in the previous CMP documents. On the other hand, there are interim processes agreed to in CMP Redesign that, if one accepts Qwest's assertion, are at some stage of implementation. These interim processes are reflected in the Interim Draft Master Redlined CLEC-Qwest CMP Re-Designed Framework (the "Interim Draft CMP Document"), Exhibit A to the Brief and Status Report. The fact that CMP is reflected in at least two documents contradicts Qwest's claim that the "governing process for

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[6] Brief and Status Report, Exhibit B-4, at. 4

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change management is contained in a single document . . ."[7] Therefore, anyone wishing to

participate in Qwest's CMP would have to understand which redesigned processes are being

implemented (and the degree to which they are being implemented) and which processes remain

from the CMP that existed before CMP Redesign commenced. This is not necessarily

straightforward.

It is not clear to the CLECs what Qwest has chosen to implement from the redesigned

process and what is yet to be implemented.[8] It has become apparent that even Qwest is not clear

on which redesigned processes are to be implemented fully or, if it is clear that they should be

implemented, Qwest has not figured out how to implement them or has chosen not to.[9] This has

been a source of confusion and dissatisfaction between Qwest and CLECs that continues today.

AT&T provides two examples to illustrate this point.

1.   __Qwest Interim Product/Process Change Management Process.__

The Brief and Status Report states that Qwest and CLECs have agreed to the Qwest-

initiated product/process change request process and that Qwest has implemented this process.[10]

This is not accurate, based on information presented by Qwest at the CMP Redesign meetings

held on October 30 – November 1, November 13 and 27 – 29, 2001.[11] The process Qwest refers

to is entitled "Qwest Interim Product/Process Change Management Process, Revised 10-3-01"

attached hereto as Exhibit A. This document has three major concepts: (i) that Qwest will

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[7] *Id.*, at. 3.

[8] *Id.*, Exhibit B-4, at 2 - 4.

[9] *Id.*, Exhibit B-4, at 3, "[Judy] Schultz stated Qwest was in a difficult position of trying to manage CMP between the existing processes and the processes being developed by the Redesign team." Ms. Schultz is Qwest's Director of Change Management.

[10] *Id.*, at 9.

[11] *Id.*, Exhibit B-3 at 2 and Exhibit B-4 at 4 –5 (for example, "[Judy] Schultz further stated that the CLECs had identified four criteria that should be used for determining if a change is CLEC affecting, and that Qwest has a dilemma due to the fact that Qwest sees many other items as CLEC affecting"). There are no minutes out yet for the November 27 – 29 CMP Redesign session, but this topic was addressed in detail during those meetings.

submit CRs through CMP when it seeks to make a change in product or process that "alter CLEC operating procedures"; (ii) that if a Qwest-proposed change does not alter CLEC operating procedures, Qwest will notify CLECs and provide an opportunity to comment; and (iii) in all cases Qwest would redline changes to Qwest product documents or, if impracticable to redline, highlight the areas where changes are proposed and provide an historical change log. At the November 27 – 29, 2001 CMP Redesign meeting, the parties discussed this process again because of confusion on the part of Qwest on how to implement this process, concern on the part of CLECs that the process was not being implemented as written and that the process is deficient.

It became clear through that discussion that (i) Qwest was still unclear on when it should issue CRs for product/process changes and (ii) in spite of the clear language in the process document, Qwest was not redlining all changes and that Qwest had still not yet started issuing an historical change log with each change. Moreover, CLECs pointed out their observation that the process as written simply allows a Qwest change to product or process to go through to completion, even in the situation where Qwest submits a Change Request ("CR")[12] and CLECs object to the CR. There is no ability on the part of CLECs to reject or deny a Qwest CR. The CLECs' only avenue is to pursue escalation or dispute resolution. CLECs have identified this as a deficiency in the interim process, and the parties are discussing how to address this deficiency.

2.   **Regulatory Change.**

In the Interim Draft CMP Document, a Regulatory Change is defined as follows:

> A Type 2 change is mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and

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[12] AT&T uses "CR" (for Change Request) throughout this document. A CR is a form that a party seeking change in Qwest systems, product or process populates with its request and submits to Qwest for handling in the Qwest Change Management Process.

federal courts. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. Either the CLEC or Qwest may initiate the change request.[13]

On October 25, 2001, Qwest issued a list of system CRs for prioritization by CLECs and Qwest.[14] Qwest included in that e-mail a list of nine CRs Qwest identified as "regulatory" CRs. Qwest's proposal for regulatory CRs is that they will not be prioritized. This means that CLECs would have no voice into whether such CRs get completed and no opportunity to evaluate how important they are as compared with other CRs competing for the resources Qwest has available for the next interface release. The result is that the regulatory CRs would get done before any other CR sought by a CLEC, accomplishing Qwest's goals, while leaving CLECs' requests unresolved.[15] CLECs want the ability to prioritize all CRs, whether they are regulatory, industry guideline change, Qwest initiated or CLEC initiated, understanding that if Qwest is specifically required by a court or regulatory order to complete a change by a date certain that date would need to be accommodated. This is a central issue to the redesign and it remains unresolved.

On October 29, 2001, AT&T sent Qwest an e-mail asking that Qwest explain the basis for identifying the CRs as regulatory.[16] There were meetings and conference calls, but for some reason Qwest could not (or would not) clearly answer the question. In preparation for a meeting that was held on November 19, 2001, Qwest sent CLECs another list of "regulatory" CRs for IMA 10.0 by e-mail on November 16, 2001, attached as Exhibit D. Without discussion or explanation, the list of regulatory CRs was reduced from nine to five. While this narrowed the

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[13] Brief and Status Report, Exhibit A, at 9.
[14] E-mail from Mark Routh to the CMP distribution dated October 25, 2001, Subject: Vote requested-IMA 10.0 Prioritization, attached as Exhibit B.
[15] Theoretically, CLECs can submit regulatory CRs as well, but there are no examples of that. Recent experience causes AT&T concern that Qwest will use this type of change to advantage Qwest to the detriment of CLECs, as indicated by the examples herein.
[16] E-mail message from Mitchell Menezes to Mark Routh dated October 29, 2001, Subject: Vote requested-IMA 10.0 Prioritization. *See* Exhibit C.

discussion, it still left unanswered the question of what criteria Qwest was applying to label a CR as regulatory. While this call proved unproductive, because Qwest did not have the right people available, these matters were discussed again at the last CMP Redesign meeting, on November 27 – 29, 2001. Two significant pieces of information resulted from the Redesign discussion (although Qwest has yet to provide the promised written explanations to CLECs):

a.   Qwest identified the Colorado Performance Assurance Plan ("PAP") docket as the basis for identifying as regulatory CRs system changes to improve flow through (resulting in improved Qwest performance under one or more Performance Indicator Definitions - PIDs). Although repeatedly asked where in the Colorado Commission's orders these changes were mandated, Qwest was unable to provide an answer. It appears that Qwest's position is that if Qwest is making payments (or believes it will have to make a payment) under a PID included in a PAP, Qwest can seek to identify a change that would improve its performance under the PID as a regulatory change, in order to minimize Qwest's exposure to making payments under its PAPs.

b.   Qwest identified the FCC's *UNE Remand Order* as the basis for one of its "regulatory" changes dealing with the availability of high capacity loops. Since the FCC's *UNE Remand Order* was issued two years ago,[17] CLECs asked Qwest whether the systems change Qwest proposed was necessary to comply with the FCC's order. Qwest stated that it was already in compliance with the FCC's order through a manual process, but that it needed the systems change in order to mechanize its process to make it more efficient for Qwest, including reducing Qwest's costs. CLECs objected, because this is inconsistent with the definition for regulatory change identified above and because CLECs do not have the opportunity to identify their CRs as

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[17] *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Third Report and Order, FCC 99-238 (rel. Nov. 5, 1999).

regulatory (to be done ahead of all other CRs) because it will improve their efficiency or reduce their costs. At the November 27 – 29, 2001 CMP Redesign meeting, Qwest agreed to withdraw this item from the list of regulatory CRs for IMA 10.0, presumably because, once light was shed on Qwest's inappropriate behavior, Qwest personnel realized it would be problematic to proceed. That said, it is not clear that Qwest will not attempt to submit this as a regulatory change in a future release.

These examples make clear that Qwest has not implemented the redesigned process for regulatory CRs, because Qwest has attempted to put forward CRs that are inconsistent with the definition of Regulatory Change set forth in the Interim Draft CMP Document. It is also clear that Qwest seeks to use the Regulatory Change label as a way to game the process and place its own CRs forward that have more to do with Qwest efficiency and cost savings than they have to do with regulatory mandates. CLECs have strenuously objected to this and expect further discussion of this topic at later CMP Redesign meetings.

Another problem with the regulatory CRs Qwest put forward is that Qwest did not actually submit CRs to the CMP body. The only explanation CLECs received about the CRs was in the tables provided by Qwest in its October 25, 2001, and November 16, 2001, e-mail messages referenced above (Exhibits B and D). There are one or two line descriptions that shed no light on what Qwest was really trying to do. Moreover, Qwest's CRs for these changes are not available on the Qwest website, so CLECs could get no further information about these CRs unless Qwest provided it directly. CLECs have repeatedly stated that any CR for a Regulatory Change must explain in detail the basis for identifying it as a Regulatory Change, including docket numbers, order numbers, page numbers, paragraph numbers and dates. Without such

information, Qwest can game the system, just as it has attempted to do with the above-referenced changes.

AT&T has identified two significant areas (Qwest product/process changes and Regulatory Change) that demonstrate both the lack of clarity around what Qwest has implemented from the redesigned process and that, to the extent Qwest may have implemented certain redesigned process, Qwest has not implemented them as written and agreed to by the CLECs. There may be other examples AT&T and other CLECs have not yet identified, and Qwest has presented no evidence of its implementation of redesigned processes in this docket.

Once CMP Redesign is completed, AT&T believes that three things must happen before the Commission can be satisfied that Qwest has implemented the redesigned CMP: (i) Qwest should provide evidence of such implementation, including rewritten methods and procedures for its employees that document the changed processes, communication of these changes to employees, training of employees on these changed process and evidence from the CMP forum that the redesigned processes are being followed; (ii) these must be an independent third-party review of Qwest's implementation of the redesigned processes to insure the integrity of such implementation; and (iii) CLECs should be given the opportunity to provide input on Qwest's implementation of the redesigned processes.

B.   Parity Among the Different Interfaces

Qwest currently provides two IMA interfaces. One is an application-to-application interface ("EDI") and the other is a web-based graphical user interface ("GUI"). Some CLECs may use EDI, but not the GUI. Some CLECs may use the GUI, but not EDI. Some CLECs may use both. The EDI and GUI interfaces may not have the same functionality available to CLECs at the same time. This could put one group of CLECs at an advantage as compared to another

group of CLECs for a period of time until the other interface is updated with the same functionality.

An example of this problem arose recently. Qwest notified CLECs that with its 8.01 release of the GUI, it would implement a new function called the appointment scheduler. This function appears to require CLECs to select a due date and time for an LSR to be scheduled based upon Qwest's resource availability. Attached as Exhibit E is an e-mail dated October 23, 2001, from an AT&T employee to the CMP distribution expressing concern about this new function. One concern expressed was that because the change initially affects IMA GUI only, there will be disparity between CLECs with EDI versus CLECs with the GUI interface. CLECs using the EDI interface will continue to have more flexibility in scheduling due dates for some period of time while GUI users would not have that flexibility. *See* Exhibit E. This was discussed at a CMP Redesign meeting.[18] It appeared through the discussions that the function would be implement for EDI approximately three months after it is implemented for the GUI. After these concerns were raised and discussed with Qwest several times, Qwest withdrew the appointment scheduler function from the release of GUI 8.01. *See* Exhibit F.[19] In addition, the Interim Draft CMP Document now states "IMA GUI changes for a pre-order or ordering will be implemented at the same time as an IMA EDI release."

While the resolution of this issue appears to be positive, one must recognize that this was an issue as late as November 2, 2001, when CLECs learned that Qwest would pull the appointment scheduler function from IMA GUI 8.01.[20] It remains an open question as to whether Qwest will ensure, going forward, that each OSS interface has the same functionalities

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[18] Brief and Status Report, Exhibit B-3, at 12.
[19] E-mail from Mark Routh dated November 2, 2001.
[20] *Id.*, Exhibit A, at 33.

available at the same time.

C.   CLECs' Proposal to Include PIDs in CMP

CLECs have proposed that change management of PIDs be included within the scope of
CMP. This topic has been discussed in CMP Redesign meetings, but so far Qwest has rejected
this proposal.[21] This is an important issue that requires further discussion. It is clear that the
systems, products and processes managed by CMP are so closely tied to the PIDs that it would
be efficient to have them managed by the same process. Below are two examples that illustrate
the close relationship between the systems, products and processes under CMP and the PIDs.

First, from the discussion above about Regulatory Change, it is clear that Qwest intends
to introduce CRs that impact Qwest's performance under the PIDs. If that is the case, such CRs
require full disclosure so that CLECs are aware of the reason for the change request. In addition,
it may be appropriate to discuss the PIDs themselves in the context of the systems change being
proposed.

Second, AT&T has observed recently that Qwest has rejected CLEC CRs, citing PIDs as
the basis for the rejection.[22] There are two examples in a communication sent by Qwest on
November 12, 2001. With the first CR, a CLEC requested that Qwest reduce the twenty-four
hour commitment time for all LNP trouble tickets. Qwest rejected this CR because the PID MR-
11 was established and applies a twenty-four hour period to measure Qwest's performance. *See*
attachment to Exhibit G. With the second CR, a CLEC requested that Qwest change the current
switch disconnect process (where a number has been ported) so the disconnect occurs

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[21] *Id.*, B-4, at 5. This topic was also discussed at the Redesign meeting held on October 30 – November 1; however,
the minutes do not reflect that discussion. Lynn Stang was present for Qwest and stated that Qwest was not
interested in having change management of PIDs conducted by the CMP group.

[22] Exhibit G is an e-mail dated November 12, 2001, from Qwest to CLEC participants in CMP with final CR
Responses from Qwest on three CRs. Qwest rejected two of them (LNP Repair Interval and LNP Switch
Disconnect Timing) because PIDs were in place.

immediately after the CLEC activates the ported number. Again, Qwest rejected this CR because the PID OP-17 had been established and Qwest believed that the process it had in place (disconnect at 11:59 p.m. on the day after the port) was adequate. *See* attachment to Exhibit G.

The fact that PIDs are established should not be a basis to freeze in time the performance Qwest provides to CLECs. If CLECs identify an important issue and Qwest would prefer to reject it because a PID is in place, it is not appropriate for Qwest to reject the CR out of hand. Rather, it is appropriate to have an informed discussion among CLECs and Qwest that includes both the CR and the PID, to arrive at a resolution that addresses the performance issue raised by the CLEC.

Because the systems, products and processes managed in CMP are closely tied to the PIDs, it is appropriate to include PIDs within the scope of change management so that appropriate coordination can take place. This would promote disclosure and informed discussion and it would better accommodate the goal of achieving improved performance.

D.   CLECs Do Not Have the Same Opportunity for Their CRs to be Completed as Qwest Does

In the Brief and Status Report, Qwest states that the change request process provides an opportunity for all change requests to be discussed, clarified and modified at monthly CMP meetings.[23] On its face this sound fine, but if one looks at how Qwest CRs are handled versus CLEC CRs, CLECs do not have the same opportunity for their CRs to go through the process successfully that Qwest does.

The "CLEC-Qwest OSS Interface Change Request Initiation Process"[24] contained in the Interim Draft CMP Document has a step where Qwest evaluates whether Qwest can implement

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[23] Brief and Status Report, at 4 and 5.
[24] *Id.*, Exhibit A, at 12 – 17.

the CR and Qwest "accepts" or "denies" the CR with an explanation of the basis for denial.[25] Why does Qwest alone have the right to accept or deny a CR? Why don't the CLECs have the ability to reject a Qwest CR? The result of a rejection is that a party has the right to pursue escalation or dispute resolution. However, the paragraphs following the language on acceptance/denial in this process make it very clear that the only party who is impacted by a denial and would pursue escalation or dispute resolution is a CLEC. In all cases, CLECs have the burden of overcoming a denial of their requests (in addition, if Qwest pursues its own CR over the objection of CLECs, CLECs have to escalate or pursue dispute resolution to prevent that CR from going into effect). The process would be much more balanced if CLECs had the ability to reject Qwest CRs and Qwest would be in the position of having to pursue dispute resolution to have its CR approved. (Escalation would likely be pointless since the escalation is within Qwest. One would assume Qwest's CR would always prevail there.)

The Qwest Interim Product/Process Change Management Process attached as Exhibit A deals with Qwest initiated CRs for product/process changes. This process does not contain the concept of acceptance or denial. As written, it appears to assume that the Qwest proposal will go through and if CLECs do not like it they have to escalate and/or pursue dispute resolution. CLECs are currently observing the process in practice and realize it needs change because a Qwest-initiated change is being shoved down their throats over their objection. Instead of Qwest having to prove that its process change should be implemented, CLECs bear the burden of demonstrating why Qwest's process change should *not* be implemented, constantly and inappropriately placing the burden on CLECs.

The Qwest CR at issue is numbered PC 100101-5. Qwest described the CR as follows:[26]

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[25] CLECs still want to flesh out and limit the criteria Qwest can use when making this determination.
[26] Exhibit H contains an e-mail dated December 5, 2001, with a joint escalation of this CR by three CLECs.

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Currently, CLECs' are responsible for testing UNE's prior to submitting a trouble report to Qwest. CLECs' are to provide test diagnostics including specific evidence that the trouble is in the Qwest Network along with the associated Qwest circuit identification number. If the CLEC elects not to perform the necessary UNE testing, Qwest will offer to do such testing on CLECs' behalf. If such testing is requested by the CLEC, Qwest will perform the additional testing and bill the CLEC the appropriate charges that are in their Interconnection agreement.

If the CLEC does not provide test diagnostics and elects not to have Qwest perform additional testing on their behalf, Qwest will not accept a trouble report. Additional Charges may apply when the testing determines the trouble is beyond the Loop Demarcation Point This additional testing option is available on the Unbundled Loop Product Suite, Unbundled Dedicated Transport (UDIT), Enhanced Extended Loop (EEL) and Loop Mux.

CLECs have objected to this CR for several reasons, not the least of which being that the terms of this change are, or may be, inconsistent with individual CLEC interconnection agreements. *See* Exhibit H. The point of mentioning this is not to seek resolution of the substance of this issue here, but to illustrate the point that for a CLEC to have a meaningful opportunity to influence the outcome of a Qwest-initiated CR, the CLEC has to escalate or pursue dispute resolution, always bearing the burden of proving why the Qwest CR should not go into effect.

E.   **Qwest Does not Provide Production Support to CLECs on the Same basis that Qwest Provides Production Support to Itself**

At the last CMP Redesign Meeting held on November 27 – 29, 2001, one of the topics discussed was production support, which is the support Qwest provides to CLECs when they have problems with an operational support system after it goes into production. Troubles of this kind are to be directed to Qwest's IT Help Desk. Attached as Exhibit I is a draft of Production Support language for the Interim Draft CMP Document that CLECs and Qwest are still working

on, but outlines what has been discussed so far regarding production support. In this language Qwest has outlined four severity levels, with Severity1 being the most critical and Severity 4 the least critical.

There was a great deal of discussion about Severity 1 troubles because, being the most critical, they are worked immediately. What CLECs learned is that Qwest looks at Severity 1 troubles from a "global" perspective. Global in this context means to Qwest that the trouble has a broad impact on *Qwest's* business. The problem with this view is that the trouble would have to affect multiple CLECs before Qwest would treat it as a Severity 1 problem. So, if a single CLEC is unable to use Qwest's interface, for whatever reason, and its business is broadly impacted, that alone would not be severe enough in Qwest's view to treat it as a Severity 1 trouble.

This is an issue of parity. If, for example, Qwest will treat an IT trouble as Severity 1 because the trouble impacts all of Qwest's retail customers, then Qwest should likewise treat an IT trouble as Severity 1 if all of a single CLEC's retail customer are impacted. This is a significant issue for the CLECs and goes to the heart of what the CMP is about. It is still very much an open issue and requires further discussion.

F.   Customer Test Environment

One of the FCC requirements for approval of Qwest's application is that Qwest have available a stable testing environment that mirrors production.[27] AT&T is providing the Commission with separate comments on the Qwest Stand-Alone Test Environment. Those comments will provide detail on the deficiencies of Qwest's test environment. However, the issue of a Customer Test Environment ("CTE") arose in CMP Redesign (November 27 – 29,

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[27] Brief and Status Report, at 2.

2001). The Interim Draft CMP Document contains a section entitled "Application-to-

Application Interface Testing."[28] This section provides some description of the CTE Qwest has

available to CLECs. A provision within this section of the interim Draft CMP Document states

as follows:

> The CTE contains the appropriate applications for pre-ordering and Local Service
> Request (LSR) ordering up to *but not* including the service order processor. Qwest
> intends to include the service order processor as part of the SATE component of the
> SATE by the end of 2002. (emphasis added)

It is clear from the above admission that Qwest's test environment does not mirror the

production environment, because Qwest uses manual steps for the service order processor

functions in the test environment, whereas those steps are mechanized in the production

environment. This alone causes the SATE to fail to meet the FCC's standard.

G.   Many Issues Still Open in All Areas of CMP Redesign

1.   The Issues Lists Identify Many Open Issues.

It is very important for this Commission to appreciate the number of issues identified thus

far in the CMP Redesign that have not yet been addressed. Attached as Exhibit J is the "CLEC-

Qwest Change Management Re-design Working Sessions, Core Team Issues/Action Items Log –

Open, Revised November 29, 2001." This list contains fifteen pages of open issues, many of

which are systems issues, that have been identified thus far and still require discussion at CMP

Redesign. Attached as Exhibit K is the "Future CMP Redesign Working Session Action Item

Discussions – Revised 11-29-01." This list reflects what the CLECs and Qwest have determined

to be the items to discuss next at the CMP Redesign meetings. Note that most of the first page

deals with systems issues. This does not list in detail the product/process issues that have yet to

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[28] *Id.*, at 61 – 63.

be discussed. Attached as Exhibit L is a four page issues list provided by AT&T to Qwest at the CMP Redesign meeting held on November 13, 2001. These issues were identified as a result of internal discussions at AT&T prior to the November 13, 2001, redesign meeting, and they have not yet been discussed. Attached as Exhibit M is an issues list provided by WorldCom to Qwest at the CMP Redesign meeting held on November 13, 2001. These issues have yet to be discussed. In addition, Qwest has agreed to do a "gap" analysis with CLECs by comparing several sources of issues on change management to capture further issues not yet identified. That is scheduled to occur in January 2002.[29]

The issues listed in the documents referenced above are the issues that have been identified in CMP Redesign so far. It is fair to expect more issues to be added as discussions proceed and as the CLECs observe Qwest's performance of the redesigned process. It should be clear to this Commission and to Qwest that there is no basis to suggest that "systems issues have been resolved" as Qwest states in the Brief and Status Report.[30] Many of the systems issues have been discussed, but there are many issues that are far from resolution, including prioritization, regulatory changes, industry guideline changes, production support, denial of CRs, the exception process applicable to CRs, the walk-on process applicable to CRs, discussion of the different types of notifications Qwest provides, criteria for level of effort associated with systems CRs, defined terms, and more. To suggest that systems issues are resolved and that the Commission may approve Qwest's compliance with its obligations associated with change management denies CLECs the very collaboration required by the FCC. In addition to the systems issues, CLECs and Qwest have the entire product/process piece of CMP Redesign to address. The

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[29] *See id.*, Exhibit C.
[30] *Id.*, footnote 9 and at 6.

collaboration must continue until completion of the redesign and Qwest's successful implementation of the redesigned process.

2. The Schedule for CMP Redesign Meetings Acknowledges that Much Work Needs to be Done

It is also telling to review the "CLEC-Qwest Change Management Process Re-design Schedule of Working Sessions, Revised November 29, 2001" attached as Exhibit C to the Brief and Status Report. This schedule reflects meetings scheduled through April 16, 2002. This is an indication of agreement between Qwest and CLECs that much work is still needed on CMP.

3. The "CM" Issues in the Brief and Status Report Reflect Many Open Issues

Running quickly through the "CM" issues for which Qwest provides status in the Brief and Status Report, there appear to be fourteen issues still open out of the original eighteen:

CM –1 (Clarity and accessibility of Qwest CICMP documents). The discussion in part IV.A., Qwest's "Current" Change Management Process" describes how Qwest documentation for CMP is not clear and is not being implemented as written.

CM-2 (Definition and adequacy of Qwest's escalation and dispute resolution process). The escalation and dispute resolution processes in the Interim Draft CMP Document are untried so their adequacy are not yet known. In addition, the discussion in part IV.D of these comments, CLECs Don't Have the Same Opportunity for Their CRs to be Completed as Qwest Does, the CMP is deficient in that Qwest is never put in the position of having to escalate or dispute a matter that arises in CMP.

CM-3 (Five categories of changes in SBC documents). Qwest states that it has already implemented four categories of change in the CMP process. The four categories would include regulatory changes, industry guideline changes, CLEC-initiated changes and

Qwest-initiated changes. It is unclear what Qwest has implemented because the regulatory change category is still an open issue and prioritization of regulatory and industry guideline changes are still open issues. *See* part IV.A.2 above. In addition, Qwest's draft language on Production Support states that Severity 3 and Severity 4 troubles are to be addressed through the CR process. Since Qwest had previously indicated that it would handle all production support issues without the use of CRs,[31] the parties now need to address Production Support as a category of change.

CM-6 (Frequency of scheduled CICMP meetings). This issue is related to item 4 on AT&T's issue list at Exhibit L, the aggregate time it will take for a systems CR to run through the process. This remains open for discussion.

CM-7 (Qwest generated CRs). Qwest has agreed to do CRs, but whether they get the same treatment through the process as Qwest CRs is still an open issue. *See* part IV.D above.

CM-8 (Proprietary CR). Open per the Brief and Status Report.

CM-10 (Whether CLECs have had input into the development of the CMP). Starting in July 2001, AT&T can say that CLECs have had input into the development of a redesigned CMP; however, that input is not completed yet and the CLECs do not yet have a redesigned process to rely upon. This issue will not be satisfied until a clear process emerges and is followed by Qwest. That time has not come yet. *See* part IV.A above.

CM-12 (WorldCom not allowed to vote on EDI CRs). Open per the Brief and Status Report.

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[31] This is why Production Support was struck from "Types of Change." *See* Brief and Status Report, Exhibit A, at 8.

CM-13 and 16 (Scope of CMP). The Interim Draft CMP Document does reflect language on scope; however, in virtually every CMP Redesign meeting, as discussion proceeds, parties repeatedly state that the parties need to verify that an issue under discussion is covered within the scope. This is an item that will be revisited periodically through the redesign process and then clarified, to the extent necessary, at the end of the process.

CM-14 and 15 (Whether Contents of Exhibit G and H should be included in SGAT). Exhibits G and H were the old CMP document and the old CMP escalation process, respectively. Those will not be attached. Qwest states that it will attach the redesigned CMP document as an exhibit to its SGAT. This may work, but it hinges upon what the language in Section 12.2.6 of the SGAT states and that is unresolved to this point.

CM-17 (Processes for notification of CLECs and adequacy of process). There are at least three issues on the Core Team Issues/Action Items Log, Exhibit J, that deal with notification. They are numbered 42, 145 and 156. These are open issues.

CM-18 (Documents described and as yet unidentified or unknown, which include the change request prioritization process and other links). Open per the Brief and Status Report.

4. Exhibit E to the Brief and Status Report is Misleading and Should be Ignored

AT&T objects to the use of Exhibit E to Qwest's Brief and Status Report for any purpose. With this exhibit, Qwest has taken the Interim Draft CMP Document, accepted all changes and <u>deleted</u> all comments inside the document that reflect issues and areas of concern. The whole point of maintaining the Interim Draft CMP Document in redline form with comments included is to make clear that it is not complete and requires a great deal of work

before it can stand alone and be used to govern the CMP. Footnote 3 of the Brief and Report

states that Qwest prepared this document "for purposes of the change management workshop;"

however, use of this form of the document would be inconsistent with the way the parties have

proceeded with the CMP Redesign. If Qwest wants to use a non-redlined version of the Interim

Draft CMP Document, it should (i) restore all of the comments included in the body of the

redlined version and (ii) place a header on each page to indicate that the document (a) is an

incomplete draft prepared solely for use in the Arizona change management workshop, (b) that it

only partially reflects the status of change management redesign and (c) that it does not identify

the many open/unresolved issues.

V.   CONCLUSION

Based on the foregoing and as summarized below, CMP Redesign has not progressed

sufficiently to determine that Qwest has met the FCC criteria for 271 approval.

A.   Information Relating to the on Change Management Process is Not Clearly Organized and Readily Accessible to CLECs.

Based on AT&T's comments under part IV.A above, it should be clear that the CMP is

not clearly reflected in a single document. More problematic is trying to determine which part of

which CMP document applies to any particular process at any point in time.

B.   CLECs Have Not Had Sufficient Input in the Design and Continued Operation of the Change Management Process.

This should be clear from the vast number of issues that remain open as identified in part

IV.G above.

C.   The Change Management Process Does not Yet Define a Procedure for the Timely Resolution of Change Management Disputes.

It is not clear that the process that has been adopted will result in timely resolution of disputes. A broader issue with the resolution of disputes deals with the fact that CLECs are always placed in the position of having to escalate or dispute things that happen in CMP, because Qwest controls everything. This process cannot be considered effective if CMP is not designed in a way that allows CLECs to deny Qwest CRs so that Qwest will have to use escalation/dispute process in the same way CLECs have to use it.

D.   Qwest has not Demonstrated a Pattern of Compliance with its Change Management Procedures.

In part IV.A above, AT&T has pointed out that Qwest has asserted that it follows the established process; however, Qwest has brought no evidence to support the assertion. Qwest must do so before the Commission should accept the assertion. AT&T has described in part IV.A above two areas where Qwest has clearly not complied with the process as redesigned. Moreover, AT&T has documented at least one recent experience where Qwest did not follow its processes. Attached as Exhibit N is a memo from the AT&T redesign team members to Qwest outlining several issues. The third item describes Qwest's conduct in hurriedly setting up a conference call outside of the CMP forum with only a few CLECs in order to push through a change that Qwest wanted. On this conference call, Qwest sought a vote from the few CLECs who participated. The CLECs declined. Qwest's conduct in this situation was improper and did not reflect any process in place at the time.

E. **Qwest Does not Yet Make Available a Stable Testing Environment that Mirrors Production.**

In part IV.A above, and in its SATE Comments, AT&T has demonstrated that Qwest

does not yet provide a stable testing environment that mirrors the production environment.

Respectfully submitted this 7th day of December 2001.

> **AT&T COMMUNICATIONS OF THE**
> **MOUNTAIN STATES, INC. AND TCG**
> **PHOENIX**
>
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INTERIM QWEST PRODUCT/PROCESS CHANGE MANAGEMENT PROCESS

Qwest is in the process of updating the documentation it provides to CLECs as a result of the commitments it has made in the workshops and as a result of issues that have been identified in OSS testing. The following is the process Qwest will follow until the completion of the redesign process for Qwest's CMP for product and process changes:

I.   Changes that alter CLEC operating procedures.

As soon as practicable before the next scheduled CMP monthly meeting, Qwest shall submit distribute notification and post on the CMP web site a Change Request and related documentation for changes that alter CLEC operating procedures for pre-ordering, order/provisioning, maintenance/repair and billing for local services. The CR shall describe the change to be made to the process, along with any proposed changes to Qwest documentation available to CLECs. The CR will include the following: If practicable, Qwest will provide a redlined version indicating the changes from the prior document version. If providing redlined versions is not practicable, Qwest will indicate the changes in the documentation. Qwest will indicate the source of the changes.

- If practicable, a red-lined version of each changed document showing changes from the most recent document version;
- If providing a red-lined version is not practicable for a document, a version of the document with changes highlighted;
- For each changed document, a historical log listing each change, the version of the document changed, the date of the change, and the reason for and source of the change.

Qwest will discuss present the CR at the next CMP Monthly Forum. Under special circumstance, CLECs or Qwest may request that a special CMP Forum be held to address a CR or to invoke the CMP Exception Process. At the CMP meeting, the parties will discuss whether comments are necessary, and time frames for such comments, if applicable. Unless another schedule is agreed to at the CMP meeting, the following procedure will be followed:

- Any CLEC All CMP members may file comments on the CR within 15 days of the CMP Monthly Forum.

- Within 15 days, Qwest will respond to comments and provide a final notice of the changes, along with any proposed changes to Qwest documentation available to CLECs. The notification shall be provided to CLECs at least 15 days before the effective date of the change.

Any CLEC may raise issues relating to its comments at any CMP meeting held before or after the effective date of the change. Any issues that cannot be resolved may be submitted to the Escalation and/or Dispute Resolution Processes as set forth in the CMP Re-Design Master Red Lined Document.

II.   Changes that do not alter CLEC operating procedures.

For changes that do not alter CLEC operating procedures for pre-ordering, order/provisioning, maintenance/repair and billing for local services, Qwest shall provide notice of such changes to CLECs, along with any changes to Qwest documentation available to CLECs. ~~If practicable, Qwest will provide a redlined version indicating the changes from the prior document version. If providing redlined versions is not practicable, Qwest will indicate the changes in the documentation. Qwest will indicate the source of the changes~~. The change notice will include the following:

- If practicable, a red-lined version of each changed document showing changes from the most recent document version;
- If providing a red-lined version is not practicable for a document, a version of the document with changes highlighted;
- For each changed document, a historical log listing each change, the version of the document changed, the date of the change, and the reason for and source of the change.

CLECs may submit comments to Qwest, which will be posted on the CMP web site. Within 15 days of receipt, Qwest will respond to comments submitted by CLECs. Any CLEC may raise issues relating to its comments at any CMP meeting held before or after the effective date of the change. Any issues that cannot be resolved may be submitted to the Escalation and/or Dispute Resolution Processes as set forth in the CMP Re-Design Master Red Lined Document.

Exhibit B

From: Mark Routh [mrouth@qwest.com]

Sent: Thursday, October 25, 2001 5:51 PM

To: Lorraine McDaniels; Alan Zimmerman; Becky Quintana; Bill McKernan; Bob Carias; Byron.Dowding; Pardee,Carla D - NCAM; Christie Doherty; Clauson, Karen L.; Dave Hahn; Henry Rodighiero; jgoddard@datatrendis.com; Liz.Balvin; Loretta A. Huff; Lrucks; Lydell Peterson; Manuel Lozano; Mark Coyne; mark.r.powell@accenture.com; Marty Essen; Mary Elsness; Michelle L. Sprague; Nancy Lubamersky; Pat Chreene; pdierks@datatrendis.com; Peder Gunderson; Randy Owen; Robin Ferris; sburns; sharon_stettnichs; Shun Yeung; Tara L Breniser; Tara McDonough; Thai Am Ellis; Tim Bessey; Vicki Stedman; Victor Leung; Barbara Olson; dconnel; Kimberly Powers; Art Santry; Christine Siewert; csanphy; daniel.o'connell; FRANK Lopez; Jan Speer; Jill; Jim Thiessen; Jodi Saldivar; Kathy McBride; KC Bock; Kim.Anderson; Ray Burton; rkwhit2; Sherrey Cowley; Terry Simmons; vsakal; XO Comm; tony.markesi@cox.com; Adkisson,Ann B - NCAM; Bradley Cookson; Christine Pokrandt; Claude Wyant; ebalagot; Gayle Barton; JohnHinds; Kurt Schwartz; Rebecca Spencer; Samantha Kratzet; Steven Redinger; Susan Griffeth; Terri Walters; Marlene Cross; Willi Angermeier; Wilma Campitelli; acelink; Aelea Christofferson; Alan Flanigan; Ann Binkley; Ann Bryant; Anthony Mott; Anthony Steiner; arlen; atkinson; Audrey Thompson; Barbara Campbell; Barbara Shever; bbrohl; Becky Ferrington; Beth Woodcock; Bill Littler; Bonnie Johnson; bpang; Brad Cookson; Bret Birkholz; Bret Evans; Carl.Fitzke; Carl.H.Wengelewski; Carol Zimmerman; Caterina Alvarez; Cecilia Ortega; cfoster; chris; Chris Weise; chris.martin; Christian Nobs; Christine Mohrfeld; Christine Quinn-Struck; cicmp@z-tel.com; Claudia Merideth-Trump; corenst; cory.hamilton; crodriguez; cwinsto; Cynthia Schneider; Dale Brandenburg; Dale Musfeldt; Daniel Mackey; daolds; dbusett; dchapli; Debbie Jewell; Deborah Harwood; denise.anderson; dfriend; dheiden; Diana Anderson; Diane Highland; dlvogel; dmroth; Osborne-Miller,Donna - NCAM; dot.ludlam; dotaylo; Doug Slominski; dpetry; dset.com; dxerick; ellen.neis; eodell@dset.com; Eric Yohe; Rea,Ervin E - NCAM; Scherer,Esther A - NCAM; ewrann; exking; Fred Brigham; gary.froemel; gary.weger; Geoff Grigsby; gfitzpatrick; Gloriann Lowinske; Gregory Johnston; Hans Smits; HeadA; Ian Coleman; jan; Jane Ryberg; Janet Nimrod; Janine Truhn; jbanks; jbcluff; Jean John; Jeff Bisgard; jeremiah_christianson; Jerry Schumm; Jessica Johnson; Jheri Turner; jim; Jim Beers; Jim Maher; Jim Offerson; jlthomp; jmckenna; jnaumann; Jo Gentry; Joan Masztaler; joe; joe.sargent; John Hunt; John Mann; john.keane; Spangler,Jonathan F - NCAM; Joseph Brown; Joshua B. Nielsen; jplumb; jsteffen; Judith Schultz; Judy Barkley; Judy Lee; Judy Leuty; Judy Madden; Julie Kaufman Prentice; jwithington; jxande1; Karen Clauson; Karen Henry; karenb; Karl Brosnan; Kathy Hendricks; Kathy Stichter; kblock; kbrown; Kelly Newland; kelly_morris; Ken Olson; kevin.tollefson; Kim Gillette-Hoskins; Kim Tryggestad; kirk; Kisua Wright; Pedersen,Kathryn (Kate) - NLNS; Lana Messenger; Larry Gindlesberger; Larry Tierney; Laura Fish; Laura Hart; 'LeiLani.Jean.Hines'; lgreer; lgwood2; Lisa McNabola; Lisa Remme; Lisa Schuzer; ljbarron; lnotari; Lori Wagner; lorraine.mcdaniels; Louis Davidov; louise_c_00; Loy Fraser; lsolive; Lydell Peterson; lylelec; lynette.nickelson; Lynn Stecklein; lynn_califf; Lynne LeMon; Lynne Powers; Mana Jennings; Marcia Lees; Marianne Good; Mark Powell; Mark Powell; Mary Hendel; mary_lohnes; Megan Doberneck; mengler; Michelle Finney; Michelle Spague; Menezes,Mitchell H - LGA; mkhall; mldraper; mmoreno; moakley; mrossi; mrouth; mthacke; mxthomp; Nadine Fletcher; Nancy Kusleika; Nancy Shepherd; Nancy Thompson; Nancy Welsh; Nightfire; nleonardson; nstaros; Pam Delaittre; Paul McDaniel; Paul McDaniel; Paula Rozzi; Peggy Esquibel-Reed; Penny; Peter Budner; phahn; phil.jones; pjrobin; Quan Nguyen; Rachelle Mistone; Rae Couvillion; Ray Wilson; rdixon; reann; Reginald L. Dampier; Relene; Rhonda Rickard; Ric Martin; Richard Sampson; Rick Wright; rmacgowan; Rob Logsdon; rob.reynolds; Robert Corrus; Robert Halle; Robert Kiehl; Robert Van Fossen; robert.johnson; Ronald Trippi; Rosemarie Ferris; Rosie Glaspell; Ross Martin III; Roy Harsila; rschwartz; Ryan Hinkins; sandra.k.evans; Sandy Dennis; sarah.l.adams; sburson; Schula Hobbs; Scott Simon; Van Meter,Sharon K - NCAM; sharon.arnett; Sheila Raunig; Shirley Roberts; Shun (Sam) Yeung; smcna; smeissner; Spurgeon Youngblood; sreynolds; Stephanie Gore; Stephen Sheahan; Steve Moore; steve.taff; Steven Kast; Sue Gwin; Sue Lamb; Tamara Hillmann; Tanya Wickramasuriya; Bahner,Teresa L (Terry) - NCAM; Terry Wicks; tgburns; Theresa Hubis; Tim.allen; Timothy Bessey; tjacobs; tmontemayer; tnbailey; Todd Mead; Tom Dixon; tom_simmons; Tonya.Hall; Tracy Pledger; Trudee L. Martin; tvercellotti; Valarie Reck; Valerie Estorga; Vera Helen Clements; Vicki Stedman; vicky; Viju Hullur; vincent.jack; Virgil Newton; wdmarkert; Wendy Green; wsmalle

Subject: Vote requested-IMA 10.0 Prioritization

Hi all,

Attached are two files associated with the IMA 10.0 Prioritization Process.

- The IMA 10.0 Systems Voting.pdf file is the list of all of the candidates with their associated descriptions and related information. This can be used as a review document while you conduct your prioritization. **
- The IMA 10.0 Prioritization form.xls is the Excel spreadsheet that you will use to cast your prioritization vote. [The first twenty three CRs on the list are the CRs that were ranked as the result of the prioritization that was conducted in August]. This file should be returned to me at: mrouth@qwest.com by the designated representative of your company no later than Thursday, November 2. **PLEASE Remember, this is a Points system. Give your highest priority a point value of 49 and your lowest priority a point value of 1. Those CRs with the highest point total will be completed first.**

** In the Regulatory section of this form, there are 6 CRs that have been identified as Regulatory, but are being required by the Colorado Quality Assurance Plan. Qwest is concerned that there is no CR Type that clearly encompasses these CRs. Qwest believes these CRs are most closely aligned with the Regulatory Change CR Type. Qwest proposes to address this concern during the next Redesign Working Session.

If you have any questions, please contact me.

Thank you.

--
Mark Routh
CMP Manager - Systems
Qwest Communications, Inc.
303-896-3781

IMA 10.0 Regulatory CR's

Record #	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
1	25379*	Enhancement to accept and format orders for LSR requests with ACT=T for Unbundled Loop.	Allow IMA to accept and FTS to format orders for LSR requests with ACT=T for Unbundled Loop and Unbundled Loop with number port. This will assist the centers with flow through. Colorado QPAP Docket 01-041T.	Qwest	IMA Common	
2	25381*	Reject requests for conversion from Remote Call Forward for UBL.	The centers are currently manually rejecting requests for a conversion when RCF exists. Implement automatic reject request (in IMA for conversion from a Remote Call Forwarding (also referred to as a Market Expansion Line) to an UBL or UBL with Number Port. Colorado QPAP Docket 01-041T.	Qwest	IMA Common	
3	27029	Expand current UBL products to include OC3, OC12 OC48 and OC192 facility types.	Expand current UBL product to include OC3, OC12, OC48 and OC192 facility types. Will allow Co-Provider variations to DS0, DS1, DS3 facility types currently offered for UBL with or without UNP. Implementation will meet Federal UNE Remand mandate Docket 96-98.	Qwest	IMA Common	
4	28183*	Flowthrough - Validate Customer Address, Location Area	Customer Address Location Area (CALA) should be edited for validity on EDI LSRs. Entering SAGA or other unknown values, rather than a valid CALA results in requests dropping to manual eliminating opportunity for flow through. Edit will restrict field entry to valid CALA. Colorado QPAP Docket 01-041T.	Qwest	IMA Common	
5	28287*	UBL ECCKT field - GUI Only.	Provide an edit in IMA to ensure that QLEC provides the last two characters of the CLS in the ECCKT field on the LSR. Colorado QPAP Docket 01-041T.	Qwest	IMA GUI	
6	30623*	On-time jeopardy notification improvements	Require on-time delivery of the 45 jeopardy conditions. Interim solution to be delivered quickly with final solution for full automation and delivery of CLEC/client notification upon deployment of OBF LR form. Colorado QPAP Docket 01-041T.	Qwest	IMA Common	
8	30831	FCC Mandated Number Pooling	This UR provides for the update of IMA to match the 9.3 release of Facility Check or whichever newest release is available. In order for IMA to implement the Number Pooling functionality that the 9.3 release of FC will provide, it must be able to continue to interface with Facility Check. FCC Docket CC99-200 per K. Rehr.	Qwest	IMA Common	
9	31766*	Reject Duplicate LSRs.	IMA should reject duplicate requests. They are currently accepted and processed as new LSRs. Colorado QPAP Docket 01-041T.	Qwest	IMA Common	

Record #	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted

* *Qwest is concerned that there is no CR Type that clearly encompasses these CRs. Qwest believes these CRs are most closely aligned with the Regulatory Change CR Type. Qwest proposes to address this concern during the next Redesign Working Session.*

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
1	1	25497	Include summary USOC(s) in FOC	Providers are requesting a summary of the order by USOC to be included with the FOC so that errors can be identified and corrected before the order completes.	Qwest	IMA Common	All Products
2	2	5405937	CLECs require availability to view completed LSR information in IMA GUI	*Currently CLECs are unable to view any service order information for a completed LSR within IMA GUI even without the IMA system being purged (per Interconnect Helpdesk). This causes repercussion as CLECs are unable to obtain downstream information vital to maintaining accurate internal reporting information. Examples of such information include completed order numbers, date of activation, date of service delivery, accurate percentage of requested due dates with on time delivery. CLECs need to be given the ability to view their subscribers account information on an as needed basis. This request is focused on the entire CLEC community being able to access this type of information as needed Verizon would like to have available, a record for any LSR submitted for a min of 30 days and max of 90 days to see how the account was established, to make sure that the delivery dates are met and that the account is activated as requested.* Qwest Business Description: Need ability to view service order for completed LSR within GUI in order to access info needed for accurate internal reporting. Examples-completed order numbers, date of activation and service delivery, accurate percentage of requested due dates with on time delivery.	Verizon	IMA GUI	Resale
3	3	25001	Update FOM LSR Status to match CRM Status	When CRM receives a jeopardy notification from WFA the LSR Status is updated in CRM but not in IMA. When order and request statuses are updated in CRM, Service Order and LSR statuses in IMA need to be updated to match.	Qwest	IMA Common	All Products
4	4	5466837	Electronic Completion Notices for Stand Alone Directory	Provide CLEC's electronic completions on any Stand Alone Directory order that that is sent electronically. Today Qwest does not provide electronic completion information on Stand Alone Directory orders that are sent electronically to Qwest. Qwest Business Description: Provide electronic completion notices for any Stand Alone Directory order that is sent electronically.	Sprint	IMA Common	Stand Alone Directory Orders

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
5	5	27756	Cancellation Remarks	Cancellation Remarks Qwest Business Description: A special remark shall be entered on each flow through service order associated with a cancellation supplemental LSR.	Qwest	IMA Common	All Products
6	6	SCR073001-4	Identification of CSR Customer Code	When a CLEC looks in IMA for a CSR (Customer Service Record) at times they find more than 1 live account with different cus codes for the same TN. There is no way for the CLEC to determine which live account to use when issuing the LSR. This causes the CLEC to issue the LSR on the incorrect account. Therefore, causing flow through issues and ultimately delays in service provisioning, which becomes customer affecting. Qwest Business Description: Multiple live accounts with different cus codes for the same TN can be listed in a CSR. Determine which live account to use when issuing the LSR in order to eliminate using an incorrect account, causing flow through issues and delaying provisioning.	Eschelon	IMA GUI	
7	7	5043011	Add an online glossary of the field title abbreviations to help menu of IMA GUI	Add an online glossary under the help menu in IMA GUI. This should identify the acronyms/abbreviations for the IMA GUI field titles so provisioners won't need to look them up under another source. Qwest Business Description: Add an online glossary of the field title abbreviations to the help menu of IMA GUI.	Eschelon	IMA GUI	

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
8	8	5464965	Provide location and department information in partial CSR, if continue to require this information	CLEC asks Qwest to eliminate Qwest's requirement that CLECs place complete the location and department fields in IMA-GUI (release 6.0). Orders are rejected when the LOCN or DEPT fields do not match Qwest records or if the fields are not completed. The only way to obtain the information for the fields is to pull a FULL Customer Service Record (CSR). This is extremely time consuming and inefficient. Only a certain amount of data downloads at one time, and then CLECs must sift through unneeded information to find the LOCN and DEPT information. In a separate CR, Eschelon has asked that Qwest eliminate the requirement altogether. If Qwest does not do so, at a minimum, Qwest should provide the department and location information as part of the PARTIAL CSR. Qwest Business Description: Provide dept and location info in partial CSR to satisfy requirement. Orders rejected when LOCN or DEPT fields do not match Qwest's records or if fields are incomplete. Inefficient to pull FULL CSR to extract info.	Eschelon	IMA GUI	Centrex/Western Region
9	9	26047	Enhancement for Loop-Qual Tool - Loop Qual Reservation System	Loop Qual Reservation System enhancement that would allow a telephone number and email address to be entered. The system would re-qualify the telephone number for Megabit services automatically, send an email when TN qualifies for service.	Qwest	IMA Common	DSL

Report Name: IMA Priority Candidates NEW SCORING FORM

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
10	10	25091	DSL Flowthrough - ReBranding	Long term Flowthrough. The actual conversion from CAP based to DMT based networks was implemented April 4, 2001. Existing CAP based Qwest DSL will be supported until 2003. Qwest DSL Select will be replaced with Qwest DSL 256. Qwest DSL 256 will offer some of the same features as Qwest DSL Select but it will be DMT based as opposed to CAP based. Qwest DSL 256 provide customers with dedicated service but at a slower downstream speed; 256 Kbps and will not be offered in DA Hotels/RT's. The available Qwest DSL services are: Qwest DSL 256, Qwest DSL Deluxe, Qwest DSL Pro Deluxe, Qwest DSL Pro 640, Qwest DSL Pro 1M, Qwest DSL Pro 4M and Qwest DSL Pro 7M. Currently, DMT and CAP based Qwest DSL service requests are processed by the ISC. To achieve POTS flow for DMT based requests, ISP/IHOST information needs to be auto-validated. ISP validation will allow for full flow through. CAP based orders will continue with a design flow for allowable feature changes; contract interval changes, ISP/IHOST changes and feature changes. Also, as of 6/14/01 CAP based Qwest DSL services will not be offered but will be maintained until 2003.	Qwest	IMA Common	DSL
11	11	14886	Pre-order Transaction: Due Date availability & standard Intervals	Standard intervals should be mechanized in CLEC electronic interfaces based on standard interval guide (QCB).	Qwest	IMA Common	All Products
12	12	5498578	Ability to send dual CFA information on an LSR for HDSL orders	Qwest informed WorldCom of the following ordering practices: To order 4-wire HDSL-capable loops, the LSR must populate the first of two consecutive CFAs (each CFA representing a copper pair) along with the proper NC/NCI codes to order 4-wire HDSL capable. Upon receipt, Qwest would then validate the ordered CFA plus availability of the next consecutive channel pair and populate both cable ID's and circuit ID's on the returned FOC. WorldCom specifically asked our Account Team what would happen if an LSR had dual CFA information populated; the response was that the order would drop out for manual handling and be rejected. Ultimately, WorldCom would like a system change that would allow the dual CFA to be populated on an LSR, and would be willing to accept the following interim solution until this CR could be implemented (next available release 9.0-4/02): Let the LSR drop out for manual handling, but instead of rejecting the order, validate the ordered CFA and the availability of the next consecutive channel pair and process the order. WCom predicts that the current loop delivery interval would be preserved with the implementation of this change.	WorldCom	IMA GUI	HDSL

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
13	13	25591	Flowthrough Validate LPIC LSR Entries	An edit to validate PIC and LPIC values is needed. Edits will eliminate SOP errors associated with invalid PIC and LPIC values on service orders and save provisioning time by eliminating time spent researching invalid PICs in RCMAC.	Qwest	IMA Common	LPIC
14	14	SCR073001-1	IMA edits (7-10 digits) for Customer Forwarding Number (CFN) floats for features on Centrex lines	Eschelon requests a systems change to provide IMA edits for 7-10 digits for Customer Forwarding Number (CFN) floats for features on Centrex lines. IMA-GUI currently allows CLECs to use 10 digits, and the SOP edits to the correct number. But, for Centrex products, no edit occurs, and the CLEC provisioner must enter either 7 or 10 digits, as appropriate. Qwest should allow CLECs to use 10 digits on all orders, with Qwest's system should edit the order if 7 is appropriate for Centrex products, as it does now for 1FB. Qwest's centers have electronic, up-to-date access to this information and, therefore, CLECs should also have such access.	Eschelon	IMA GUI	Centrex/West ern Region
15	15	28186	Telephone Number Reservation - Prohibit Multiple Selections of 9 Telephone Numbers	TN Reservation functionality in Pre Order system allows CLEC to make multiple selections of 9 telephone numbers from which to choose a number. The TN Reservation functionality should be modified to prevent this, so that available TNs in a CO are not depleted.	Qwest	IMA Common	
16	16	23943	Shared Distribution Loop- Long Term	Shared Distribution Loop is defined as making available the opportunity for the CLEC to offer ADSL qualified advanced data services simultaneously with an existing end user's analog voice grade service provided by Qwest on the distribution loop. The CLEC will use the data portion of the loop while Qwest will maintain the voice portion of the loop. The voice circuit is originating at the Qwest Central Office and terminates at the Network Interface at the customer location. The data originates at the CLECs DSLAM located at their established form of Remote Collocation and terminates at the Network Interface at the customer location. One of the system functionalities used for all of the Shared Products is the new process of ordering line conditioning after the service has already been established. Ideally, the need for line conditioning would be detected during the Pre-Order Raw Loop Data query, where the CLEC can see if there are bridge taps or load coils that need to be removed. However, there is a possibility that the service order was completed erroneously, indicating that the service is provisioned when in fact it is inoperative, since the testing proved that the line needs conditioning. The CLEC needs a mechanism whereby they can order line conditioning on an existing service.	Qwest	IMA Common	SDL

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
17	17	26636	Shared Loop Enhancements	This project stemmed out of the work done for the Shared Distribution Loop (SDL) long-term solution. Several of the functionalities that were identified for the SDL product also needed to be applied to the Shared Loop product. • Provide full follow-through for Shared Loop orders that have LNA=N • Provide the ability to recap meetpoints from the Pre-Order query in IMA to the LSR. • Allow conversion from Qwest DSL to Shared Loop to be an LNA=V • Allow conditioning to be requested after Shared Loop service has been established	Qwest	IMA Common	Shared Loop
18	18	25505	Line Splitting for UNE-P accounts	Accept LSR for line sharing on a UNE-P account, class of service UHR. Accept LSR issued by the provider of UNE-P that contains splitting information regarding the DLEC. Accept the LSR with information for central office based and remote line sharing. Enhance loss and completion report for Line Splitting goes to CLEC (owner of UNE-P). Allow line sharing USOCs to appear on the UNE-P (class of service UHR) account to provision and bill. NC/NCI codes for Line Splitting are requested and will be provided at a later date. Conditioning is allowed on Line Splitting, the TRAK fid will be used. Basic installation is the only installation option available for Line splitting	Qwest	IMA Common	UNE-P
19	19	27751	Intrabuilding Cable.	An Intra-Building Cable (IBC) is a 2 wire or 4 wire facility that extends from a building terminal or other accessible terminal that services one Multi-Tenant Environment (MTE) building on a property to the end-user's network interface device (NID). A CLEC obtains access to the IBC at an established MTE-POI arrangement. The MTE-POI product allows the CLEC to cross-connect at the building terminal for Multi-Tenant Environment Buildings. The following forms will be used between Qwest and the Co-Provider for ordering IBC: • LSR - Local Service Request • EU - End User Information • LS – Loop Service Request	Qwest	IMA Common	Intrabuilding Cable
20	20	25800	Add New Auto Push Statuses	Auto Push two existing IMA statuses: 'Submitted' and 'Partial'. Display the new auto-push statuses in SOSI consistently with what is auto-pushed.	Qwest	IMA Common	All Products

Report Name: IMA Priority Candidates NEW SCORING FORM

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
21	21	24758	Redundant EDI auto-push transactions	Check for additional redundant EDI auto-push transactions	Qwest	IMA Common	All Products
22	22	26639	Clarify usage of the DSPCH and the SCA fields on the LSR	Clarify usage of the DSPCH and the SCA fields on the LSR. UBL DSPCH/SCA fields ACT=N, V, C, T, Z	Qwest	IMA Common	UBL Product
23	23	24652	Unbundled DID/PBX Trunk Port Facility move from LS to PS	The Unbundled DID/PBX Trunk Port product is currently setup to use the IMA Loop Services (LS) form when it should be using the Port Services (PS) form	Qwest	IMA Common	Unbundled PID/PBX Trunk Port
24	Not Ranked	31321	Accept Cancel Status	Today the system does not pick-up the Cancel status on a service order canceled by one of the SOPs. Due to completions issues need IMA to pick-up and display the Cancel status.	Qwest	IMA Common	All Products
25	Not Ranked	4869887	Allow IMA GUI users to build LSR templates to use when creating new LSRs.	ALLTEL would like the ability to create templates that can be used when creating new LSRs.	Alltel	IMA GUI	
26	Not Ranked	5079096	Order Review included in FOC	When FOC is provided, a summary by USOC is included.	Sunriver Telecom	IMA Common	
27	Not Ranked	5370997	Disconnect Business Rule Change	Covad would like the address requirement lifted from disconnect loop orders. Currently, approximately 25% of our disconnect orders receive system rejects for invalid address. Technically, only CFA and/or ILEC Circuit are required elements to successfully process a disconnect. *Provided that a co-provider keeps accurate record of which ILEC Circuit has been assigned to a particular customer, there should be no need to re-validate a customer address.* This change request is an effort on our part to minimize the number of system rejects that we are receiving in production. This problem has become particularly noticeable on orders which were originally placed in IMA EDI 4.2 and are now being disconnected in IMA EDI 5.0 (or greater).	Covad	IMA Common	Unbundled Loop

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
28	Not Ranked	5464735	Eliminate delay due to error message indicating CFA in use, when it is not	When CLEC submits a loop order to Qwest, the order is rejected for any reason, and CLEC re-submits the order, IMA responds with an error message indicating that the CFA is already in use. The CFA, however, is not in use, because the order was rejected (for reasons that may be unrelated to the CFA). At this time, CLEC then must call escalations to clear this, which results in a 2 to 3 day delay. Only after the issue is cleared up may the CLEC re-submit the order (and only then does the interval begin). *Without this delay, the order could be corrected and re-submitted on the same day, which would not extend the interval.* Qwest should change the system so that it allows the CLEC to use the CFA in this situation. Alternatively, if that is not possible, Qwest should allow CLEC to use the same request (the rejected request) with an increment (such as 1 or a) to avoid the delay that is currently associated with the escalation process and clearing the CFA.	Eschelon	IMA GUI	Unbundled Loop
29	Not Ranked	5466535	More detailed FOC	We would like to receive a more detailed FOC on all resale orders to include the following: 1) USOCs, 2) FIDs, 3) How the hunting sequence is set up once the Qwest order is typed, listing the numbers in the order of the hunt sequence. 4) When applicable, what is the call forwarding number on the order? 3) LPIC and PIC. 4) Verify if a voice mailbox exists on the order. McLeod has experienced a huge number of Qwest typist errors. When Qwest receives an order from McLeod, Qwest has the ability to reject the order based on errors. McLeod wants the capability to ensure our order has been typed the way we wrote it. This would be possible through a more detailed FOC.	McLeodUSA	IMA EDI	Resale 1FB,Centrex
30	Not Ranked	5556774	Requesting Qwest to Re-cap LML on Directory Listings.	Request that Qwest re-cap LML so that the CLEC's are not required to recap Directory Listings. McLeod is currently having to send Centrex order types in order to avoid the massive development behind having to support the development of us re-capping. Please see Annelyn Aficial regarding this issue, she can provide details. This is a high priority issue for McLeod due the volume it effects.	McLeodUSA	IMA EDI	

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
31	Not Ranked	5578937	Access to DSL pre-qualification information	Please improve CLEC access to the DSL pre-qualification information to reduce the number of error messages and give CLEC at least the same access to the same information as Qwest receives. Often, when Eschelon uses Qwest's IMA-GUI loop pre-qualification tool, the result is indeterminate. Instead of a yes or no response, Eschelon receives an error message. For example, the error message may indicate that the address and telephone number did not match. When Eschelon then calls Qwest, Qwest is able to run the request and receive a yes or no answer, even though Qwest is using the same address and telephone information used by Eschelon. In some cases, the customer already has DSL (and wants to upgrade speed, etc.). Even though the customer already has DSL, Eschelon cannot get pre-qualification information using IMA-GUI. But, when Eschelon calls Qwest, Qwest is able to retrieve the information using its internal systems. Eschelon has been working with Qwest to try to resolve this issue. Recently, Qwest has indicated that the issue may be addressed in Release 9.0, which will not occur until the end of the year. That is too long to wait. Also, no documentation has been provided as to what changes will be made during Release 9.0 and whether any changes will fully address the issue.

Call Karen Clausen at Eschelon to discuss the fix going / for Mega Bit (Qwest DSL) Loop Qual and make sure that it addresses Eschelon's concerns | Eschelon | IMA GUI | Resale, Unbundled Loop,Other |
| 32 | Not Ranked | SCR082801-1 | Add a Read Only User access for IMA | Add a Read Only User access for IMA. For users who need to access info but do not need to make changes or add orders. Such as a Salesman who wishes to Qualify a loop for DSL service. Then they can look up the information themselves and need not bother the Provisioning staff. | Allegiance | IMA GUI | |
| 33 | Not Ranked | SCR083001-1 | NPI (Number Port Indicator) field utilization for LSR request routing. | Utilize NPI field for order distribution. Currently the CLEC populates the field with data that identifies port in and port within information. The NPI field is not a recognized field for Qwest LSOG5. Qwest's system routes the orders based on REQTYP. Within the REQTYP requests can contain port in or port within service and need to be routed to the Qwest Center that handles that type of service request. Significant service affecting problems, up to and including customers out of service for several days, arise on the due date as a result of these types of orders not be routed to the correct Qwest service center for processing. Update Qwest systems to identify port in and port within using the NPI to ensure these orders are routed to the correct Qwest processing center. | Eschelon | IMA GUI | |

Report Name: IMA Priority Candidates NEW SCORING FORM

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
34	New - CLEC	SCR092501-1	Capability to submit Directory Listing information at the same time the LSRs are being submitted through EDI for UNE orders.	On UNE orders, Allegiance wants the capability to submit Directory Listings information at the same time the LSRs are being submitted through EDI on New Facility orders, Partial Migration orders, and Move orders. Allegiance wants the option to be able to do this through EDI or to still be able to submit DL information through the IMA GUI separately from the EDI order as is the current capability.	Allegiance	IMA EDI	UNE
35	New - CLEC	SCR092501-2	Eliminate multiple LSRs for Moves, Changes and Disconnects of TNs	On unbundled loop ordering, once an end user has been established with the CLEC, all subsequent order activity for the end user must be on a separate LSR for each TN involved even when all TNs are at the same end user location. This order activity includes Move orders, Change orders, and Disconnect orders. Allegiance wants the ability to put multiple TNs on one LSR without having to supply each separate SBN for each circuit. There is no place to put multiple SBNs on one LSR. There are fields to put multiple TNs and circuit IDs. This current practice required by Qwest greatly increases the processing time and hard dollar expense to the CLECs to have to submit separate LSRs for multiple TNs. Qwest is the only ILEC that requires separate LSRs for multiple TNs for the same End User at the same location. Allegiance is requesting that Qwest develop the ability to allow CLECs to process multiple TNs on one LSR. Also, Qwest does not allow for the migration of existing facilities from Qwest and the addition of new facilities for the same end user at the same location to be processed on the same LSR. Allegiance is requesting that Qwest develop the ability to allow the CLECs to be able to do this as well.	Allegiance	IMA EDI	UBL

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
36	New - CLEC	SCR092801-1	Release Addendum deadline date and Addendum submission requirements	McLeodUSA has two change requests in regards to release addendum's. McLeodUSA is requesting a deadline date to be initiated for the submission of addendum's pertaining to a IMA/EDI release. To our knowledge there is not currently a deadline date associated with addendum's. We would request that all addendum's be submitted by Qwest, within 30-days of the Disclosure document being published. McLeod would also like to put a requirement in place that would require that each addendum be reviewed and discussed with Qwest and the CLEC, to ensure that the CLEC's will not be impacted with development changes (on the EDI side). If it is found that their will need to be changes to development for the CLEC to support the addendum, then the CLEC would have the right not to support the addendum until the following release. McLeodUSA has been faced with numerous last minute development changes, due to addendum's being issued very close to our EDI release implementation dates.	McLeodUSA	IMA EDI	
37	New - CLEC	SCR100101-1	Archive Loss and Completion Reports	Currently the loss and completion reports are not archived by Qwest. Once a CLEC accesses the report, it is no longer available from Qwest. CLECs have the ability to archive the reports once they are accessed, however, if the report is inappropriately accessed by an individual who is not aware of the CLEC archive process, the reports are no longer available from Qwest.	AT&T	IMA Common	Unbundled Loop, UNE-P
38	New - CLEC	SCR100101-2	Flow through indicator on FOCs.	Currently Qwest does not have a flow through indicator on Firm Order Completion notices. (FOCs). It would be helpful for CLECs to know whether an order flows through or falls out for manual handling.	AT&T	IMA Common	Unbundled Loop, UNE-P

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
39	New - CLEC	SCR100201-1	Eschelon asks Qwest to provide 'true' flow through for LSRs submitted.	Currently Qwest identifies these products as eligible for flow through, however it has been Eschelon's experience that the partial service order creation does not include service order detail including but not limited to CFA, USOCs, etc. Eschelon continues to provide examples of service order errors that Qwest has made when service orders have not been issued by Qwest SDCs as requested on our LSRs. Qwest's SDCs use the feature called Cutting and Pasting. CFA information is often incorrect on a service order because augments to our co-locations have different naming conventions. For resale and UNE-P, features including but not limited to CFN (Call Forwarding Number) and PIC (Primary Interexchange Carrier) are often omitted completely or essential information pertaining to these features is omitted leaving our end user customer without the functionality requested on our LSR. Since there is no ability to proactively identify Qwest service orders prior to DD (detail available on Service Order Completion only) the customer has been negatively impacted by the time the error is detected. Eschelon asks Qwest to provide TRUE flow through for LSRs submitted.	Eschelon	IMA Common	
40	New - CLEC	SCR100501-1	Update documentation in order to provide the explanation of the data found in the Raw Loop Data Query.	This is a request by Eschelon to provide some documentation that describes/defines the data contained in the Raw Loop Data Query.	Eschelon	IMA Common	
41	New - Qwest	29629	Allow service order number beginning with A on FOC	Service order numbers that begin with an "A" are currently not allowed in IMA on FOC. A placeholder SO number is used and the actual SOP SO number is entered in Remarks. Auto completion will not be performed on LSRs that have placeholder SO numbers. This change will allow the A Order types to auto complete. The A Order type is used only in the Eastern region after a "Disconnect" to transfer calls to another number.	Qwest	IMA EDI	All Products
42	New - Qwest	29731	USOC Identification for Total Reach	Loop Extension Technology offers the Competitive Local Exchange Carriers (CLEC's) additional loop extension technology for ISDN (BRI) and xDSL-I capable unbundled loops only. In order to successfully provision and install a CLEC request for an xDSL-I or Basic Rate ISDN capable loop over metallic cable pair, loop loss and characteristics may require the placement of Extension Technology equipment on the requested Unbundled Loop. The addition of this equipment will ensure that the network interface to network interface requirements meet the ANSI Standards as set in ANSI T1.601.	Qwest	IMA Common	Total Reach

Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
43	New - Qwest 30212	UNE-P PAL needs to be added to IMA	The UNE-P PAL product is taking a Qwest finished product and breaking it down into its unbundled elements for billing purposes. Essentially, UNE-P PAL is a fully finished service offered at Wholesale rates. UNE-P PAL offers the equivalent functionality of the Retail two-way "Basic PAL" service. A Basic PAL line is a dumb line connected to a smart phone. The smart phone contains a microprocessor that is programmed to do all the coin collection and return, call billing and routing. CLECs may order new UNE-P PAL combinations or convert preexisting Qwest Retail or Resold PAL services to UNE-P PAL. UNE-P PAL consists of the following unbundled network elements: • 2-Wire Voice Grade Analog Loop • Analog Line Side Port Switch • Shared Transport	Qwest	IMA GUI	UNE-P PAL
44	New - Qwest 30819	Loop Splitting	Shared Loop is defined as making available the opportunity for a Data Local Exchange Carrier (DLEC) to offer qualified advanced data services (ADSL) on an existing Qwest end user's analog voice grade service. The end user service considered candidates for Shared Loop are simple Business/Residential customers, either flat rate or measured (e.g. 1FR, 1FB & 1MR). In the central office, a loop carrying ADSL traffic is split by a device called a POTS Splitter. One end is connected to an ADSL modem for access to the internet; the other end is connected to the switch for voice communication. The DLEC will use the data portion of the loop while Qwest will maintain the voice portion of the loop. The following forms will be used between Qwest and the Co-Provider for Shared Loop ordering purposes: • LSR - Local Service Request • EU - End User • LS –Loop Service Request • LSNP – Loop Service With Number Portability Request	Qwest	IMA Common	UBL
45	New - Qwest 30822	EEL IMA Business Rules Updates	Some business rules for EEL/UNE Combination in IMA should reflect the ordering of EEL service and the product definition. Descrepancies between the business rules in IMA and the product definition will then be corrected.	Qwest	IMA Common	

Report Record #	Rank	CR Number	Title	Description Of Change	Company Name	Interface Impacted	Product Impacted
46	New - Qwest	30827	Flowthrough of Retail Orders	Currently no Retail REQTYP in IMA, so Retail orders are issued as Resale and flagged for manual handling. Add REQTYP DB to IMA to be valid with ACT D.and all non-Resale TOS codes, and with ACT C and Megabit TOS codes only.	Qwest	IMA EDI	Products
47	New - Qwest	32093	Business Rules Updates	Some business rules for POTS Resale need updating to allow correct orders for Switched Private Line Services such as Foreign Exchange Service and Foreign Central Office Service. Expected outcome is to allow successful order of Switched Private Line Services via IMA. Currently these services are ordered through the iIS process. These products will be added to IMA. The TOS field will be used to direct the request to manual handling.	Qwest	IMA Common	
48	New - Qwest	32095	Remove CONVIND Field	The CONVIND field is a Qwest specific field that is not used for flow through processing any longer. The system counts lines and determines full or partial conversion based on whether the number of lines on the request match the number of lines on the account. CONVIND should be removed from IMA to avoid continued CLEC and ISC/IWSC confusion over use of the field.	Qwest	IMA Common	All Products
49	New - Qwest	SCR092601-1	Change edits applied to notification(s) allowed after an FOC is sent.	Allow a jeopardy notification after a FOC instead of a non-fatal error after a FOC.	Qwest	IMA Common	All Products

IMA 10.0 Candidates for Prioritization Voting Form

Report Record #	New Vote	Rank	CR Number	Title	Company Name	Interface Impacted	Product Impacted
1		1	25497	Include summary USOC(s) in FOC	Qwest	IMA Common	All Products
2		2	5405937	CLECs require availability to view completed LSR information in IMA GUI	Verizon	IMA GUI	Resale
3		3	25001	Update FOM LSR Status to match CRM Status	Qwest	IMA Common	All Products
4		4	5466837	Electronic Completion Notices for Stand Alone Directory	Sprint	IMA Common	Stand Alone Directory Orders
5		5	27756	Cancellation Remarks	Qwest	IMA Common	All Products
6		6	SCR073001-4	Identification of CSR Customer Code	Eschelon	IMA GUI	
7		7	5043011	Add an online glossary of the field title abbreviations to help menu of IMA GUI	Eschelon	IMA GUI	
8		8	5464965	Provide location and department information in partial CSR, if continue to require this information	Eschelon	IMA GUI	Centrex/Western Region
9		9	26047	Enhancement for Loop-Qual Tool - Loop Qual Reservation System	Qwest	IMA Common	DSL
10		10	25091	DSL Flowthrough - ReBranding	Qwest	IMA Common	DSL
11		11	14886	Pre-order Transaction: Due Date availability & standard intervals	Qwest	IMA Common	All Products
12		12	5498578	Ability to send dual CFA information on an LSR for HDSL orders	WorldCom	IMA GUI	HDSL

IMA 10.0 Candidates for Prioritization Voting Form

Report Record #	New Vote	Rank	CR Number	Title	Company Name	Interface Impacted	Product Impacted
13		13	25591	Flowthrough validate LPIC LSR Entries	Qwest	IMA Common	LPIC
14		14	SCR073001-1	IMA edits (7-10 digits) for Customer Forwarding Number (CFN) floats for features on Centrex lines	Eschelon	IMA GUI	Centrex/Western Region
15		15	28186	Telephone Number Reservation - Prohibit Multiple Selections of 9 Telephone Numbers	Qwest	IMA Common	
16		16	23943	Shared Distribution Loop- Long Term	Qwest	IMA Common	SDL
17		17	26636	Shared Loop Enhancements	Qwest	IMA Common	Shared Loop
18		18	25505	Line Splitting for UNE-P accounts	Qwest	IMA Common	UNE-P
19		19	27751	Intrabuilding Cable.	Qwest	IMA Common	Intrabuilding Cable
20		20	25800	Add New Auto Push Statuses	Qwest	IMA Common	All Products
21		21	24753	Redundant EDI auto-push transactions	Qwest	IMA Common	All Products
22		22	26839	Clarify usage of the DSPCH and the SCA fields on the LSR	Qwest	IMA Common	UBL Product
23		23	24652	Unbundled DID/PBX Trunk Port Facility move from LS to PS	Qwest	IMA Common	Unbundled PID/PBX Trunk Port
24		Not Ranked	31321	Accept Cancel Status	Qwest	IMA Common	All Products
25		Not Ranked	4869887	Allow IMA GUI users to build LSR templates to use when creating new LSRs.	Alltel	IMA GUI	

IMA 10.0 Candidates for Prioritization Voting Form

Report Record #	New Vote	Rank	CR Number	Title	Company Name	Interface Impacted	Product Impacted
26		Not Ranked	5079096	Order Review included in FOC	Sunriver Telecom	IMA Common	
27		Not Ranked	5370997	Disconnect Business Rule Change	Covad	IMA Common	Unbundled Loop
28		Not Ranked	5464735	Eliminate delay due to error message indicating CFA in use, when it is not	Eschelon	IMA GUI	Unbundled Loop
29		Not Ranked	5466535	More detailed FOC	McLeodUSA	IMA EDI	Resale 1FB,Centrex
30		Not Ranked	5556774	Requesting Qwest to Re-cap LML on Directory Listings.	McLeodUSA	IMA EDI	
31		Not Ranked	5578937	Access to DSL pre-qualification information	Eschelon	IMA GUI	Resale, Unbundled Loop,Other
32		Not Ranked	SCR082801-1	Add a Read Only User access for IMA	Allegiance	IMA GUI	
33		Not Ranked	SCR083001-1	NPI (Number Port Indicator) field utilization for LSR request routing.	Eschelon	IMA GUI	
34		New - CLEC	SCR092501-1	Capability to submit Directory Listing information at the same time the LSRs are being submitted through EDI for UNE orders.	Allegiance	IMA EDI	UNE
35		New - CLEC	SCR092501-2	Eliminate multiple LSRs for Moves. Changes and Disconnects of TNs	Allegiance	IMA EDI	UBL
36		New - CLEC	SCR092801-1	Release Addendum deadline date and Addendum submission requirements	McLeodUSA	IMA EDI	

IMA 10.0 Candidates for Prioritization Voting Form

Report Record #	New Vote	Rank	CR Number	Title	Company Name	Interface Impacted	Product Impacted
37		New - CLEC	SCR100101-1	Archive Loss and Completion Reports	AT&T	IMA Common	Unbundled Loop, UNE-P
38		New - CLEC	SCR100101-2	Flow through Indicator on FOCs.	AT&T	IMA Common	Unbundled Loop, UNE-P
39		New - CLEC	SCR100201-1	Eschelon asks Qwest to provide 'true' flow through for LSRs submitted.	Eschelon	IMA Common	
40		New - CLEC	SCR100501-1	Update documentation in order to provide the explanation of the data found in the Raw Loop Data Query.	Eschelon	IMA Common	
41		New - Qwest	29629	Allow service order number beginning with .A. on FOC	Qwest	IMA EDI	All Products
42		New - Qwest	29731	USOC Identification for Total Reach	Qwest	IMA Common	Total Reach
43		New - Qwest	30212	UNE-P PAL needs to be added to IMA	Qwest	IMA GUI	UNE-P PAL
44		New - Qwest	30819	Loop Splitting	Qwest	IMA Common	UBL
45		New - Qwest	30822	EEL IMA Business Rules Updates	Qwest	IMA Common	
46		New - Qwest	30827	Flowthrough of Retail Orders	Qwest	IMA EDI	Products
47		New - Qwest	32093	Business Rules Updates	Qwest	IMA Common	
48		New - Qwest	32095	Remove CONVIND Field	Qwest	IMA Common	All Products
49		New - Qwest	SCR092601-1	Change edits applied to notification(s) allowed after an FOC is sent.	Qwest	IMA Common	All Products

IMA 10.0 Candidates for Prioritization Voting Form

Report

Record #	New Vote	Rank	CR Number	Title	Company Name	Interface Impacted	Product Impacted

C:\WINNT\Profiles\nicolehoover\Temporary Internet Files\OLK6B\(IMA 10.0 Prioritization form.xls)Sheet1

Exhibit C

From: Menezes,Mitchell H - LGA

Sent: Monday, October 29, 2001 12:29 PM

To: 'Mark Routh'; 'Lorraine McDaniels'; 'Alan Zimmerman'; 'Becky Quintana'; 'Bill McKernan'; 'Bob Carias'; 'Byron.Dowding'; Pardee,Carla D - NCAM; 'Christie Doherty'; 'Clauson, Karen L.'; 'Dave Hahn'; 'Henry Rodighiero'; 'jgoddard@datatrendis.com'; 'Liz.Balvin'; 'Loretta A. Huff'; 'Lrucks'; 'Lydell Peterson'; 'Manuel Lozano'; 'Mark Coyne'; 'mark.r.powell@accenture.com'; 'Marty Essen'; 'Mary Elsness'; 'Michelle L. Sprague'; 'Nancy Lubamersky'; 'Pat Chreene'; 'pdierks@datatrendis.com'; 'Peder Gunderson'; 'Randy Owen'; 'Robin Ferris'; 'sburns'; 'sharon_stettnichs'; 'Shun Yeung'; 'Tara L Breniser'; 'Tara McDonough'; 'Thai Am Ellis'; 'Tim Bessey'; 'Vicki Stedman'; 'Victor Leung'; 'Barbara Olson'; 'dconnel'; 'Kimberly Powers'; 'Art Santry'; 'Christine Siewert'; 'csanphy'; 'daniel.o'connell'; 'FRANK Lopez'; 'Jan Speer'; 'Jill'; 'Jim Thiessen'; 'Jodi Saldivar'; 'Kathy McBride'; 'KC Bock'; 'Kim.Anderson'; 'Ray Burton'; 'rkwhit2'; 'Sherrey Cowley'; 'Terry Simmons'; 'vsakal'; 'XO Comm'; 'tony.markesi@cox.com'; Adkisson,Ann B - NCAM; 'Bradley Cookson'; 'Christine Pokrandt'; 'Claude Wyant'; 'ebalagot'; 'Gayle Barton'; 'JohnHinds'; 'Kurt Schwartz'; 'Rebecca Spencer'; 'Samantha Kratzet'; 'Steven Redinger'; 'Susan Griffeth'; 'Terri Walters'; 'Marlene Cross'; 'Willi Angermeier'; 'Wilma Campitelli'; 'acelink'; 'Aelea Christofferson'; 'Alan Flanigan'; 'Ann Binkley'; 'Ann Bryant'; 'Anthony Mott'; 'Anthony Steiner'; 'arlen'; 'atkinson'; 'Audrey Thompson'; 'Barbara Campbell'; 'Barbara Shever'; 'bbrohl'; 'Becky Ferrington'; 'Beth Woodcock'; 'Bill Littler'; 'Bonnie Johnson'; 'bpang'; 'Brad Cookson'; 'Bret Birkholz'; 'Bret Evans'; 'Carl.Fitzke'; 'Carl.H.Wengelewski'; 'Carol Zimmerman'; 'Caterina Alvarez'; 'Cecilia Ortega'; 'cfoster'; 'chris'; 'Chris Weise'; 'chris.martin'; 'Christian Nobs'; 'Christine Mohrfeld'; 'Christine Quinn-Struck'; 'cicmp@z-tel.com'; 'Claudia Merideth-Trump'; 'corenst'; 'cory.hamilton'; 'crodriguez'; 'cwinsto'; 'Cynthia Schneider'; 'Dale Brandenburg'; 'Dale Musfeldt'; 'Daniel Mackey'; 'daolds'; 'dbusett'; 'dchapli'; 'Debbie Jewell'; 'Deborah Harwood'; 'denise.anderson'; 'dfriend'; 'dheiden'; 'Diana Anderson'; 'Diane Highland'; 'dlvogel'; 'dmroth'; Osborne-Miller,Donna - NCAM; 'dot.ludlam'; 'dotaylo'; 'Doug Slorninski'; 'dpetry'; 'dset.com'; 'dxerick'; 'ellen.neis'; 'eodell@dset.com'; 'Eric Yohe'; Rea,Ervin E - NCAM; Scherer,Esther A - NCAM; 'ewrann'; 'exking'; 'Fred Brigham'; 'gary.froemel'; 'gary.weger'; 'Geoff Grigsby'; 'gfitzpatrick'; 'Gloriann Lowinske'; 'Gregory Johnston'; 'Hans Smits'; 'HeadA'; 'Ian Coleman'; 'jan'; 'Jane Ryberg'; 'Janet Nimrod'; 'Janine Truhn'; 'jbanks'; 'jbcluff'; 'Jean John'; 'Jeff Bisgard'; 'jeremiah_christianson'; 'Jerry Schumm'; 'Jessica Johnson'; 'Jheri Turner'; 'jim'; 'Jim Beers'; 'Jim Maher'; 'Jim Offerson'; 'jlthomp'; 'jmckenna'; 'jnaumann'; 'Jo Gentry'; 'Joan Masztaler'; 'joe'; 'joe.sargent'; 'John Hunt'; 'John Mann'; 'john.keane'; Spangler,Jonathan F - NCAM; 'Joseph Brown'; 'Joshua B. Nielsen'; 'jplumb'; 'jsteffen'; 'Judith Schultz'; 'Judy Barkley'; 'Judy Lee'; 'Judy Leuty'; 'Judy Madden'; 'Julie Kaufman Prentice'; 'jwithington'; 'jxande1'; 'Karen Clauson'; 'Karen Henry'; 'karenb'; 'Karl Brosnan'; 'Kathy Hendricks'; 'Kathy Stichter'; 'kblock'; 'kbrown'; 'Kelly Newland'; 'kelly_morris'; 'Ken Olson'; 'kevin.tollefson'; 'Kim Gillette-Hoskins'; 'Kim Tryggestad'; 'kirk'; 'Kisua Wright'; Pedersen,Kathryn (Kate) - NLNS; 'Lana Messenger'; 'Larry Gindlesberger'; 'Larry Tierney'; 'Laura Fish'; 'Laura Hart'; 'LeiLani.Jean.Hines'; 'lgreer'; 'lgwood2'; 'Lisa McNabola'; 'Lisa Remme'; 'Lisa Schuzer'; 'ljbarron'; 'lnotari'; 'Lori Wagner'; 'lorraine.mcdaniels'; 'Louis Davidov'; 'louise_c_00'; 'Loy Fraser'; 'lsolive'; 'Lydell Peterson'; 'lylelec'; 'lynette.nickelson'; 'Lynn Stecklein'; 'lynn_califf'; 'Lynne LeMon'; 'Lynne Powers'; 'Mana Jennings'; 'Marcia Lees'; 'Marianne Good'; 'Mark Powell'; 'Mark Powell'; 'Mary Hendel'; 'mary_lohnes'; 'Megan Doberneck'; 'mengler'; 'Michelle Finney'; 'Michelle Spague'; Menezes,Mitchell H - LGA; 'mkhall'; 'mldraper'; 'mmoreno'; 'moakley'; 'mrossi'; 'mrouth'; 'mthacke'; 'mxthomp'; 'Nadine Fletcher'; 'Nancy Kusleika'; 'Nancy Shepherd'; 'Nancy Thompson'; 'Nancy Welsh'; 'Nightfire'; 'nleonardson'; 'nstaros'; 'Pam Delaittre'; 'Paul McDaniel'; 'Paul McDaniel'; 'Paula Rozzi'; 'Peggy Esquibel-Reed'; 'Penny'; 'Peter Budner'; 'phahn'; 'phil.jones'; 'pjrobin'; 'Quan Nguyen'; 'Rachelle Mistone'; 'Rae Couvillion'; 'Ray Wilson'; 'rdixon'; 'reann'; 'Reginald L. Dampier'; 'Relene'; 'Rhonda Rickard'; 'Ric Martin'; 'Richard Sampson'; 'Rick Wright'; 'rmacgowan'; 'Rob Logsdon'; 'rob.reynolds'; 'Robert Corrus'; 'Robert Halle'; 'Robert Kiehl'; 'Robert Van Fossen'; 'robert.johnson'; 'Ronald Trippi'; 'Rosemarie Ferris'; 'Rosie Glaspell'; 'Ross Martin III'; 'Roy Harsila'; 'rschwartz'; 'Ryan Hinkins'; 'sandra.k.evans'; 'Sandy Dennis'; 'sarah.l.adams'; 'sburson'; 'Schula Hobbs'; 'Scott Simon'; Van Meter,Sharon K - NCAM; 'sharon.arnett'; 'Sheila Raunig'; 'Shirley Roberts'; 'Shun (Sam) Yeung'; 'smcna'; 'smeissner'; 'Spurgeon Youngblood'; 'sreynolds'; 'Stephanie Gore'; 'Stephen Sheahan'; 'Steve Moore'; 'steve.taff'; 'Steven Kast'; 'Sue Gwin'; 'Sue Lamb'; 'Tamara Hillmann'; 'Tanya Wickramasuriya'; Bahner,Teresa L (Terry) - NCAM; 'Terry Wicks'; 'tgburns'; 'Theresa Hubis'; 'Tim.allen'; 'Timothy Bessey'; 'tjacobs'; 'tmontemayer'; 'tnbailey'; 'Todd Mead'; 'Tom Dixon'; 'tom_simmons'; 'Tonya.Hall'; 'Tracy Pledger'; 'Trudee L. Martin'; 'tvercellotti'; 'Valarie Reck'; 'Valerie Estorga'; 'Vera Helen Clements'; 'Vicki Stedman'; 'vicky'; 'Viju Hullur'; 'vincent.jack'; 'Virgil Newton'; 'wdmarkert'; 'Wendy Green'; 'wsmalle'

Subject: RE: Vote requested-IMA 10.0 Prioritization

Mark,

I am having trouble making a connection between the Colorado Performance Assurance Plan docket and the changes for IMA 10.0 identified in the attachment to your e-mail. Would Qwest please correlate the 6 changes more specifically to the CPAP docket and the orders of the Colorado Commission. Thanks.

Mitch Menezes
AT&T Counsel
303-298-6493

-----Original Message-----
From: Mark Routh [mailto:mrouth@qwest.com]
Sent: Thursday, October 25, 2001 5:51 PM
To: Lorraine McDaniels; Alan Zimmerman; Becky Quintana; Bill McKernan; Bob Carias; Byron.Dowding; Carla Dickinson; Christie Doherty; Clauson, Karen L.; Dave Hahn; Henry Rodighiero; jgoddard@datatrendis.com; Liz.Balvin; Loretta A. Huff; Lrucks; Lydell Peterson; Manuel Lozano; Mark Coyne; mark.r.powell@accenture.com; Marty Essen; Mary Elsness; Michelle L. Sprague; Nancy Lubamersky; Pat Chreene; pdierks@datatrendis.com; Peder Gunderson; Randy Owen; Robin Ferris; sburns; sharon_stettnichs; Shun Yeung; Tara L Breniser; Tara McDonough; Thai Am Ellis; Tim Bessey; Vicki Stedman; Victor Leung; Barbara Olson; dconnel; Kimberly Powers; Art Santry; Christine Siewert; csanphy; daniel.o'connell; FRANK Lopez; Jan Speer; Jill; Jim Thiessen; Jodi Saldivar; Kathy McBride; KC Bock; Kim.Anderson; Ray Burton; rkwhit2; Sherrey Cowley; Terry Simmons; vsakal; XO Comm; tony.markesi@cox.com; Ann Adkisson; Bradley Cookson; Christine Pokrandt; Claude Wyant; ebalagot; Gayle Barton; JohnHinds; Kurt Schwartz; Rebecca Spencer; Samantha Kratzet; Steven Redinger; Susan Griffeth; Terri Walters; Marlene Cross; Willi Angermeier; Wilma Campitelli; acelink; Aelea Christofferson; Alan Flanigan; Ann Binkley; Ann Bryant; Anthony Mott; Anthony Steiner; arlen; atkinson; Audrey Thompson; Barbara Campbell; Barbara Shever; bbrohl; Becky Ferrington; Beth Woodcock; Bill Littler; Bonnie Johnson; bpang; Brad Cookson; Bret Birkholz; Bret Evans; Carl.Fitzke; Carl.H.Wengelewski; Carol Zimmerman; Caterina Alvarez; Cecilia Ortega; cfoster; chris; Chris Weise; chris.martin; Christian Nobs; Christine Mohrfeld; Christine Quinn-Struck; cicmp@z-tel.com; Claudia Merideth-Trump; corenst; cory.hamilton; crodriguez; cwinsto; Cynthia Schneider; Dale Brandenburg; Dale Musfeldt; Daniel Mackey; daolds; dbusett; dchapli; Debbie Jewell; Deborah Harwood; denise.anderson; dfriend; dheiden; Diana Anderson; Diane Highland; dlvogel; dmroth; dosborne; dot.ludlam; dotaylo; Doug Slominski; dpetry; dset.com; dxerick; ellen.neis; eodell@dset.com; Eric Yohe; Ervin Rea; Esther Scherer; ewrann; exking; Fred Brigham; gary.froemel; gary.weger; Geoff Grigsby; gfitzpatrick; Gloriann Lowinske; Gregory Johnston; Hans Smits; HeadA; Ian Coleman; jan; Jane Ryberg; Janet Nimrod; Janine Truhn; jbanks; jbcluff; Jean John; Jeff Bisgard; jeremiah_christianson; Jerry Schumm; Jessica Johnson; Jheri Turner; jim; Jim Beers; Jim Maher; Jim Offerson; jlthomp; jmckenna; jnaumann; Jo Gentry; Joan Masztaler; joe; joe.sargent; John Hunt; John Mann; john.keane; Jonathan Spangler; Joseph Brown; Joshua B. Nielsen; jplumb; jsteffen; Judith Schultz; Judy Barkley; Judy Lee; Judy Leuty; Judy Madden; Julie Kaufman Prentice; jwithington; jxande1; Karen Clauson; Karen Henry; karenb; Karl Brosnan; Kathy Hendricks; Kathy Stichter; kblock; kbrown; Kelly Newland; kelly_morris; Ken Olson; kevin.tollefson; Kim Gillette-Hoskins; Kim Tryggestad; kirk; Kisua Wright; kpedersen; Lana Messenger; Larry Gindlesberger; Larry Tierney; Laura Fish; Laura Hart; 'LeiLani.Jean.Hines'; lgreer; lgwood2; Lisa McNabola; Lisa Remme; Lisa Schuzer; ljbarron; lnotari; Lori Wagner; lorraine.mcdaniels; Louis Davidov; louise_c_00; Loy Fraser; lsolive; Lydell Peterson; lylelec; lynette.nickelson; Lynn Stecklein; lynn_califf; Lynne LeMon; Lynne Powers; Mana Jennings; Marcia Lees; Marianne Good; Mark Powell; Mark Powell; Mary Hendel; mary_lohnes; Megan Doberneck; mengler; Michelle Finney; Michelle Spague; Mitch Menezes; mkhall; mldraper; mmoreno; moakley; mrossi; mrouth; mthacke; mxthomp; Nadine Fletcher; Nancy Kusleika; Nancy Shepherd; Nancy Thompson; Nancy Welsh; Nightfire; nleonardson; nstaros; Pam Delaittre; Paul McDaniel; Paul McDaniel; Paula Rozzi; Peggy Esquibel-Reed; Penny; Peter Budner; phahn; phil.jones; pjrobin; Quan Nguyen; Rachelle Mistone; Rae Couvillion; Ray Wilson; rdixon; reann; Reginald L. Dampier; Relene; Rhonda Rickard; Ric Martin; Richard Sampson; Rick Wright; rmacgowan; Rob Logsdon; rob.reynolds; Robert Corrus; Robert Halle; Robert Kiehl; Robert Van Fossen; robert.johnson; Ronald Trippi; Rosemarie Ferris; Rosie Glaspell; Ross Martin III; Roy Harsila; rschwartz; Ryan Hinkins; sandra.k.evans; Sandy Dennis;

sarah.l.adams; sburson; Schula Hobbs; Scott Simon; Sharon Van Meter; sharon.arnett; Sheila Raunig; Shirley Roberts; Shun (Sam) Yeung; smcna; smeissner; Spurgeon Youngblood; sreynolds; Stephanie Gore; Stephen Sheahan; Steve Moore; steve.taff; Steven Kast; Sue Gwin; Sue Lamb; Tamara Hillmann; Tanya Wickramasuriya; Terry Bahner; Terry Wicks; tgburns; Theresa Hubis; Tim.allen; Timothy Bessey; tjacobs; tmontemayer; tnbailey; Todd Mead; Tom Dixon; tom_simmons; Tonya.Hall; Tracy Pledger; Trudee L. Martin; tvercellotti; Valarie Reck; Valerie Estorga; Vera Helen Clements; Vicki Stedman; vicky; Viju Hullur; vincent.jack; Virgil Newton; wdmarkert; Wendy Green; wsmalle
Subject: Vote requested-IMA 10.0 Prioritization

Hi all,

Attached are two files associated with the IMA 10.0 Prioritization Process.

- The IMA 10.0 Systems Voting.pdf file is the list of all of the candidates with their associated descriptions and related information. This can be used as a review document while you conduct your prioritization. **
- The IMA 10.0 Prioritization form.xls is the Excel spreadsheet that you will use to cast your prioritization vote. [The first twenty three CRs on the list are the CRs that were ranked as the result of the prioritization that was conducted in August]. This file should be returned to me at: mrouth@qwest.com by the designated representative of your company no later than Thursday, November 2. **PLEASE Remember, this is a Points system. Give your highest priority a point value of 49 and your lowest priority a point value of 1. Those CRs with the highest point total will be completed first.**

** In the Regulatory section of this form, there are 6 CRs that have been identified as Regulatory, but are being required by the Colorado Quality Assurance Plan. Qwest is concerned that there is no CR Type that clearly encompasses these CRs. Qwest believes these CRs are most closely aligned with the Regulatory Change CR Type. Qwest proposes to address this concern during the next Redesign Working Session.

If you have any questions, please contact me.

Thank you.

--
Mark Routh
CMP Manager - Systems
Qwest Communications, Inc.
303-896-3781

From: Mark Routh [mrouth@qwest.com]
Sent: Friday, November 16, 2001 5:10 PM
To: Osborne-Miller,Donna - NCAM; Lynne Powers; Karen Clauson; Liz.Balvin; sandra.k.evans; Wendy Green; Mark Routh; Terry Wicks; Michelle Sprague; Matthew Rossi; Peder Gunderson; Shun (Sam) Yeung; Bahner,Teresa L (Terry) - NCAM; Judy Schultz; Judy Lee; Becky Quintana; Kathy Stichter; Bill Littler; Marcia Lees; Jim Thiessen; 'LeiLani.Jean.Hines'; Van Meter,Sharon K - NCAM; Mike Zulevic; Christian Nobs; Joanne Ragge; Jim Maher; Jeffery Thompson; Mike Hydock; Tom Dixon; Lynne Lemon; Jeff Bisgard; Menezes,Mitchell H - LGA; Mana Jennings-Fader; Megan Doberneck; Jarby Blackmun; Andrew Crain; Paul McDaniel; Beth Woodcock; Susan Travis; Lorraine McDaniels; Alan Zimmerman; Bill McKernan; Bob Carias; Barbara Olson; Pardee,Carla D - NCAM; dconnel; Kimberly Powers; Lydell Peterson; Manuel Lozano; Pat Chreene; Randy Owen; sharon_stettnichs; Tara L Breniser; Art Santry; Christine Siewert; csanphy; daniel.o'connell; FRANK Lopez; Jan Speer; Jill; Jodi Saldivar; Kathy McBride; KC Bock; Kim.Anderson; Loretta A. Huff; Mary Elsness; Ray Burton; rkwhit2; Sherrey Cowley; Terry Simmons; vsakal; XO Comm; Marty Essen; Robin Ferris; tony.markesi@cox.com; Adkisson,Ann B - NCAM; AT&T Broadband; Bradley Cookson; Christine Pokrandt; Claude Wyant; Dave Hahn; ebalagot; Gayle Barton; JohnHinds; Kathleen Walter; Kurt Schwartz; Lrucks; Rebecca Spencer; Samantha Kratzet; Steven Redinger; Susan Griffeth; Terri Walters; Toni Dubuque; Byron.Dowding; Marlene Cross; Willi Angermeier; Wilma Campitelli; acelink; Aelea Christofferson; Alan Flanigan; Ann Binkley; Ann Bryant; Anthony Mott; Anthony Steiner; arlen; atkinson; Audrey Thompson; Barbara Campbell; Barbara Shever; bbrohl; Becky Ferrington; Bonnie Johnson; bpang; Brad Cookson; Bret Birkholz; Bret Evans; Carl.Fitzke; Carl.H.Wengelewski; Carol Zimmerman; Caterina Alvarez; Cecilia Ortega; cfoster; chris; Chris Black; Chris Weise; chris.martin; Christine Mohrfeld; Christine Quinn-Struck; cicmp@z-tel.com; Claudia Merideth-Trump; corenst; cory.hamilton; crodriguez; cwinsto; Cynthia Schneider; Dale Brandenburg; Dale Musfeldt; Daniel Mackey; daolds; dbusett; dchapli; Debbie Jewell; Deborah Harwood; denise.anderson; dfriend; dheiden; Diana Anderson; Diane Highland; dlvogel; dmroth; dot.ludlam; dotaylo; Doug Slominski; dpetry; dset.com; dxerick; ellen.neis; eodell@dset.com; Eric Yohe; Rea,Ervin E - NCAM; Scherer,Esther A - NCAM; ewrann; exking; Fred Brigham; gary.froemel; gary.weger; Geoff Grigsby; gfitzpatrick; Gloriann Lowinske; Hans Smits; HeadA; Ian Coleman; jan; Janet Nimrod; Janice Cox; Janine Truhn; jbanks; jbcluff; Jean John; Jeff Bisgard; jeremiah_christianson; Jerry Schumm; Jessica Johnson; Jheri Turner; jim; Jim Beers; Jim Offerson; jlthomp; jmckenna; jnaumann; Jo Bennett; Jo Gentry; Joan Masztaler; joe; joe.sargent; John Hunt; John Mann; john.keane; Spangler,Jonathan F - NCAM; Joseph Brown; Joshua B. Nielsen; jplumb; jsteffen; Judith Schultz; Judy Barkley; Judy Leuty; Judy Madden; Julie Kaufman Prentice; jwithington; jxande1; Karen Henry; karenb; Karl Brosnan; Kathy Hendricks; kblock; kbrown; Kelly Newland; kelly_morris; Ken Olson; Kim Gillette-Hoskins; Kim Tryggestad; kirk; Kisua Wright; Pedersen,Kathryn (Kate) - NLNS; Lana Messenger; Larry Tierney; Laura Fish; Laura Hart; lgreer; lgwood2; Lisa McNabola; Lisa Remme; Lisa Schuzer; ljbarron; lnotari; Lori Wagner; lorraine.mcdaniels; Louis Davidov; Louise Ng; Loy Fraser; lsolive; Lydell Peterson; lylelec; lynette.nickelson; Lynn Stecklein; lynn_califf; Lynne LeMon; Mana Jennings; Marianne Good; Mark Powell; Mark Powell; Mary Hendel; mary_lohnes; mengler; Michelle Finney; Michelle Spague; Menezes,Mitchell H - LGA; mkhall; midraper; mmoreno; moakley; mrossi; mrouth; mthacke; mxthomp; Nadine Fletcher; Nancy Kusleika; Nancy Shepherd; Nancy Thompson; Nancy Welsh; Nightfire; nleonardson; nstaros; Pam Delaittre; Pamela Johnson; Paul McDaniel; Paula Rozzi; Peggy Esquibel-Reed; Penny; Peter Budner; phahn; phil.jones; pjrobin; Quan Nguyen; Rachelle Mistone; Rae Couvillion; Ray Wilson; rdixon; reann; Reginald L. Dampier; Relene; Rhonda Rickard; Ric Martin; Richard Sampson; Rick Wright; rmacgowan; Rob Logsdon; rob.reynolds; Robert Corrus; Robert Halle; Robert Kiehl; robert.johnson; Ronald Trippi; Rosemarie Ferris; Rosie Glaspell; Ross Martin III; Roy Harsila; rschwartz; Ryan Hinkins; Sandy Dennis; sarah.l.adams; sburns; sburson; Schula Hobbs; Scott Simon; sharon.arnett; Sheila Raunig; Shirley Roberts; smcna; Spurgeon Youngblood; sreynolds; Stephanie Gore; Stephen Sheahan; Steve Moore; steve.taff; Steven Kast; Sue Gwin; Sue Lamb; Tamara Hillmann; Tanya Wickramasuriya; tgburns; Theresa Hubis; Tim.allen; Timothy Bessey; tjacobs; tmontemayer; tnbailey; Todd Mead; tom_simmons; Tonya.Hall; Tracy Pledger; Trudee L. Martin; tvercellotti; Valarie Reck; Valerie Estorga; Vera Helen Clements; Vicki Stedman; vicky; Viju Hullur; vincent.jack; Virgil Newton; wdmarkert; wsmalle
Subject: Qwest Regulatory Candidates for IMA 10.0

10.0 Regulatory with PID Refer...

Hi All,

Here is the list of candidates that Qwest views as Regulatory requirements.
We will be discussing these candidates on the call that I scheduled for Monday Nov. 19th at 1:00 p.m. mountain.

The call in number is 1-877-542-7616 and the passcode is 6145293.

Have a Great weekend.

--
Mark Routh
CMP Manager - Systems
Qwest Communications, Inc.
303-896-3781

Regulatory Candidates for Release10.0

Regulatory Changes

#	Sys	CR #	CR Title	Description	UR #
1	IMA	25379	Implement flowthrough for LSR requests with ACT=T for Unbundled Loop	Implements flowthrough for LSR requests with ACT=T (transfer) for Unbundled Loop and Unbundled Loop with number port. This CR is related to PIDs PO2A and B. Colorado Docket 011-041T	1995
2	IMA	25381	Implement edit to reject requests for conversion from Remote Call Forward for UBL	Implement the edit to automatically reject request in IMA for conversion from a Remote Call Forwarding (also referred to as a Market Expansion Line) to an UBL or UBL with Number Port. This CR is related to PIDs PO2B and PO3. Colorado Docket 011-041T.	2012
3	IMA	27029	Expand current UBL products to include OC3, OC12, OC48 and OC192 facility types.	Expand current UBL product to include OC3, OC12, OC48 and OC192 facility types. Will allow Co-Provider variations to DS0, DS1, DS3 facility types currently offered for UBL with or without LNP. Implementation is related to FCC UNE Remand mandate, Docket 96-98, Rel 99-238.	2032
4	IMA	30623	On-time jeopardy notification improvements	Implements additional automated jeopardy notifications, to a total of 45 types of jeopardy conditions. This CR is related to PIDs, PO8A, B, & D and PO9A, B, & D. Colorado Docket 011-041T.	
5	IMA	30831	FCC Mandated Number Pooling	This UR provides for the update of IMA to match the 9.3 release of Facility Check or whichever newest release is available. FCC Docket CC99-200.	

Performance Indicators Definitions

PO-2 – Electronic Flow-through

Purpose:
Monitors the extent Qwest's processing of CLEC Local Service Requests (LSRs) is completely electronic, focusing on the degree that electronically-transmitted LSRs flow directly to the service order processor without human intervention or without manual retyping.

Description:
PO-2A - Measures the percentage of all electronic LSRs that flow from the specified electronic gateway interface to the Service Order Processor (SOP) without any human intervention.

• Includes all LSRs that are submitted electronically through the specified interface during the reporting period, subject to exclusions specified below.

PO-2B – Measures the percentage of all flow-through-eligible LSRs NOTE 1 that flow from the specified electronic gateway interface to the SOP without any human intervention.

• Includes all flow-through-eligible LSRs that are submitted electronically through the specified interface during the reporting period, subject to exclusions specified below.

Reporting Period: One month **Unit of Measure:** Percent

Reporting Comparisons: CLEC aggregate, individual CLEC and Qwest Retail results

Disaggregation Reporting: Statewide level (per multi-state system serving the state).

Results for PO-2A and PO-2B will be reported according to the gateway interface used to submit the LSR:

1 LSRs received via IMA
2 LSRs received via EDI

Formula:

PO-2A = [(Number of Electronic LSRs that pass from the Gateway Interface to the SOP without human intervention) / (Total Number of Electronic LSRs that pass through the Gateway Interface)] x 100

PO-2B = [(Number of flow-through-eligible Electronic LSRs that actually pass from the Gateway Interface to the SOP without human intervention) / (Number of flow-through-eligible Electronic LSRs received through the Gateway Interface)] x 100

Exclusions:

• Rejected LSRs, non-electronic LSRs (e.g., via fax or courier).

• Records with invalid product codes.

- *Records missing data essential to the calculation of the measurement per the PID.*
- **Duplicate LSR numbers. (Exclusion to be eliminated upon implementation of IMA capability to disallow duplicate LSR #'s.)**
- Invalid start/stop dates/times.

Product Reporting:
- Resale
- **Unbundled Loops (with or without Local Number Portability)**
- Local Number Portability
- UNE-P (POTS)

Standard:
PO-2A: Diagnostic
PO-2B:
Resale: TBD
Unbundled Loops: TBD
LNP: TBD
UNE-P (POTS): TBD

Availability:
Available

Notes:
1. The list of LSR types classified as eligible for flow through is contained in the "LSRs Eligible for Flow Through" matrix. This matrix also includes availability for enhancements to flow through. Matrix will be distributed through the CMP process.

PO-3 – LSR Rejection Notice Interval

Purpose:
Monitors the timeliness with which Qwest notifies CLECs that electronic and manual LSRs were rejected.

Description:
Measures the interval between the receipt of a Local Service Request (LSR) and the rejection of the LSR for standard categories of errors/reasons.

• Includes all LSRs submitted through the specified interface that are rejected during the reporting period.

• Standard reasons for rejections are: missing/incomplete/mismatching/unintelligible information, duplicate request or LSR/PON (purchase order number), no separate LSR for each account telephone number affected, no valid contract, no valid end user verification, account not working in Qwest territory, service-affecting order pending, request is outside established parameters for service, and lack of CLEC response to Qwest question for clarification about the LSR.

• Included in the interval is time required for efforts by Qwest to work with the CLEC to avoid the necessity of rejecting the LSR.

• With hours: minutes reporting, hours counted are (1) business hours for manual rejects (involving human intervention) and (2) published Gateway Availability hours for auto-rejects (involving no human intervention). Business hours are defined as time during normal business hours of the Wholesale Delivery Service Centers, except for PO-3C in which hours counted are workweek clock hours. Gateway Availability hours are based on the currently published hours of availability found on the following website: http://www.qwest.com/wholesale/cicmp/ossHours.html.

Reporting Period: One month **Unit of Measure:**
PO-3A-1, PO-3B-1 & PO-3C - Hrs: Mins.
PO-3A-2 & PO-3B-2 – Mins: Secs.

Reporting Comparisons: CLEC aggregate and individual CLEC results

Disaggregation Reporting:
Results for this indicator are reported according to the gateway interface used to submit the LSR:
PO-3A-1 LSRs received via IMA and rejected manually – state wide level
PO-3A-2 LSRs received via IMA and autorejected – region wide level
PO-3B-1 LSRs received via EDI and

rejected manually – state wide level

PO-3B -2 LSRs received via EDI and autorejected

– region wide level

PO-3C LSRs received via facsimile -

Statewide level

Formula:

Σ [(Date and time of Rejection Notice transmittal) – (Date and time of LSR receipt)] / (Total number of LSR Rejection Notifications)

Exclusions:

- Records with invalid product codes.
- Records missing data essential to the calculation of the measurement per the PID.
- Duplicate LSR numbers. (Exclusion to be eliminated upon implementation of IMA capability to disallow duplicate LSR #'s.)
- Invalid start/stop dates/times.

Product Reporting: Not applicable (reported by ordering interface).

Standard:

- PO-3A-1 and -3B-1: ≤ 12 business hours
- PO-3A -2 and -3B -2: ≤ 18 seconds
- PO-3C: ≤ 24 work week clock

hours

Availability:

Available

Notes:

PO-8 – Jeopardy Notice Interval

Purpose:
Evaluates the timeliness of jeopardy notifications, focusing on how far in advance of original due dates jeopardy notifications are provided to CLECs (regardless of whether the due date was actually missed).

Description:
Measures the average time lapsed between the date the customer is first notified of an order jeopardy event and the original due date of the order.

• Includes all orders completed in the reporting period that received jeopardy notifications.

Reporting Period: One month **Unit of Measure:** Average Business days

Reporting Comparisons: CLEC
aggregate, individual CLEC and Qwest
Retail results

Disaggregation Reporting: Statewide level.
(This measure is reported by jeopardy notification process as used for the categories shown under Product Reporting.)

Formula:
[Σ(Date of the original due date of orders completed in the reporting period that received jeopardy notification – Date of the first [jeopardy notification) / Total orders completed in the reporting period that received jeopardy notification]

Exclusions:

• Jeopardies done after the original due date is past.
• Records involving official company services.
• Records with invalid due dates or application dates.
• Records with invalid completion dates.
• Records with invalid product codes.
• Records missing data essential to the calculation of the measurement per the PID.

Product Reporting:
A Non-Designed Services
B Unbundled Loops (with or without Number Portability)
C LIS Trunks
D UNE-P (POTS)

Standard:
A Parity with Retail POTS
B Parity with Retail POTS

C Parity with Feature Group D (FGD) services
D Parity with Retail POTS
Availability:
Available
Notes:

PO-9 – Timely Jeopardy Notices
Purpose:
When original due dates are missed, measures the extent to which Qwest notifies customers in advance of jeopardized due dates.
Description:
Measures the percentage of late orders for which advance jeopardy notification is provided.
- Includes all orders completed in the reporting period that missed original due date.
- Missed due date orders with jeopardy notifications provided on or after the original due date is past will be counted in the denominator of the formula but will not be counted in the numerator.
Reporting Period: One month **Unit of Measure: Percent**
Reporting Comparisons: CLEC aggregate, individual CLEC and Qwest Retail results
Disaggregation Reporting: Statewide level.
(This measure is reported by jeopardy notification process as used for the categories shown under Product Reporting.)
Formula:
(Total missed due date orders completed in the reporting period that received jeopardy notification in advance of original due date) / (Total number of missed due date orders completed in the reporting period) x 100
Exclusions:
- Orders missed for customer reasons.
- Records with invalid product codes.
- Records involving official company services.
- Records with invalid due dates or application dates.
- Records with invalid completion dates.
- Records with invalid product codes.
- Records missing data essential to the calculation of the measurement per the PID.
Product Reporting:
A Non-Designed Services

7

B Unbundled Loops (with or without Number Portability)

C LIS Trunks (available)

D UNE-P (POTS)

Standard:

A Parity with Retail POTS

B Parity with Retail POTS

C Parity with Feature Group D (FGD) Services

D Parity with Retail POTS

Availability:

Available

Notes:

Exhibit E

AT&T is greatly concerned about a candidate change in the Qwest IMA 8.01 GUI
upgrade due out November 19th, 2001. Candidate change 25152 will require
CLECs to select a due date and time for an LSR to be scheduled by
appointment based upon Qwest's resource availability. The enhancement reads
as follows:

"Enhancements for Appointment Scheduler - Improve Wholesale

1

customers service by scheduling appointments throughout the day, based on resource availability."

Below are a few concerns AT&T has identified:
*   The change candidate does not identify what product this will   '
affect. Qwest mentioned UNE-L at the System CMP Forum held October 18th,
however, Qwest does not specify what "resource availability" means and may
equate this change to every product Qwest provides.
•   CLECs will be required to calculate additional days into Qwest's
current service intervals to include Qwest resource availability.
•   Qwest has yet to consistently meet current service interval due
dates on all products.
*   CLECs will not have the ability to meet an end-customer request for
a due time for either a specific day or time if it does not fit into Qwest's
schedule.
*   Because this change affects how an LSR is submitted to Qwest, there
is no ability for Qwest to report performance based on customer-requested
due dates.
*   Because CLECs won't have the ability to choose a time to cut, CLECs
will experience undue resource constraints.
*   Because this change only affects IMA GUI users at this time, parity
issue arises among CLECs with an EDI and GUI interface. CLECs using EDI
interface will still have the ability choose when they or the end-customer
would like to schedule a cut, whereas, CLECs utilizing GUI with not have
they ability.

In AT&T's view, this does not "Improve" wholesale customer service and
causes CLECs to unjustly conform to Qwest's availability at the expense of
the end-customer's needs.

Per discussions at the last CMP system meeting, I heard a few CLECs voice
concern on this change similar to AT&T's concerns. Please response back to
me with some of the various concerns you have about this process change.

Jonathan Spangler
AT&T Local Services & Access Management
Western Region
Voice: 303-298-6240
Fax: 303-298-6455
Email: jfspangler@att.com
Pager: 888-858-7243 pin 106241 or
jonathan.spangler@my2way.com

From:	Mark Routh [mrouth@qwest.com]
Sent:	Friday, November 02, 2001 9:34 AM
To:	Spangler,Jonathan F - NCAM
Cc:	Budner, Pete; Krantz, Samantha; Rea,Ervin E - NCAM; Osborne-Miller,Donna - NCAM; Van Meter,Sharon K - NCAM; Menezes,Mitchell H - LGA
Subject:	Re: REMINDER: IMA Release 8.01 to be available November 19, 2001

Jonathan,

I just received word that we are pulling the Scheduling Candidate from the 8.01
release. A formal announcement will be coming shortly but I thought you'd like
to know now.

Mark

"Spangler, Jonathan F, NCAM" wrote:

> I haven't heard back about this change.
>
> Please let me know what is Qwest's intention.
>
> Jonathan Spangler
> AT&T Local Services & Access Management
> Western Region
> Voice: 303-298-6240
> Fax: 303-298-6455
> Email: jfspangler@att.com
> Pager: 888-858-7243 pin 106241 or
> jonathan.spangler@my2way.com
>
> PROPRIETARY-Restricted pursuant to the AT&T/Qwest non-disclosure
> agreement
>
> -----Original Message-----
> From: Spangler, Jonathan F, NCAM
> Sent: Monday, October 29, 2001 1:54 PM
> To: 'Routh, Mark'; 'Budner, Pete'; 'Krantz, Samantha'
> Cc: Rea, Ervin E, NCAM; Osborne-Miller, Donna, NCAM; Van Meter, Sharon
> K, NCAM; Menezes, Mitchell H, LGA
> Subject: FW: REMINDER: IMA Release 8.01 to be available November 19,
> 2001
>
> Please clarify Qwest's position on the release of IMA 8.01 scheduled for
> November 17th.
>
> As you know, AT&T is concerned with the Appointment Scheduler function
> proposed to be release in the 8.01 release. We have been told that Qwest is
> reconsidering that proposal at this time. I received the reminder attached
> below, it appears Qwest still intend to go forward with the 8.01 release,
> however, on page 9 chapter entitled "IMA Appointment Scheduler Enhancement
> for UBL Products" it indicates screenshots will be required in the IMA
> User's Guide Preorder chapter.
>
> Does this mean Qwest intends to go forward with the Appointment Scheduler
> enhancement as proposed? Or does this mean Qwest is still reconsidering the
> enhancement which is why there is no documentation provided?
>
> Please let me know.
>
> Jonathan Spangler
> AT&T Local Services & Access Management
> Western Region

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>  Voice:   303-298-6240
>  Fax:       303-298-6455
>  Email:   jfspangler@att.com
>  Pager:  888-858-7243 pin 106241 or
>  jonathan.spangler@my2way.com
>
>  PROPRIETARY-Restricted pursuant to the AT&T/Qwest non-disclosure
>  agreement
>
>  -----Original Message-----
>  From: Osborne-Miller, Donna, NCAM
>  Sent: Monday, October 29, 2001 10:54 AM
>  To: Spangler, Jonathan F, NCAM
>  Subject: FW: REMINDER: IMA Release 8.01 to be available November 19,
>  2001
>
>  Donna Osborne-Miller
>  LSAM Manager
>  OSS
>  303-298-6178 (Voice)
>  303-298-6650 (Fax)
>
>  -----Original Message-----
>  From: Theresa Hubis [mailto:thubis@qwest.com]
>  Sent: Monday, October 29, 2001 9:44 AM
>  Subject: REMINDER: IMA Release 8.01 to be available November 19, 2001
>
>   ------------------------------------------------------------------------------
>
>      Part 1.2    Type: application/ms-tnef
>              Encoding: base64
```

Exhibit G

From: Matthew Rossi [mrossi@qwest.com]

Sent: Monday, November 12, 2001 9:14 AM

To: Byron.Dowding; tmontemayer; liz.balvin; tony.markesi; terry.wicks; frank.thornton; jwithington; roferris; Mark Powell; heada; jr1856; Pedersen,Kathryn (Kate) - NLNS; flpowers; klclauson; tracyp; Louise_C_00; sandra.k.evans; cmohrfeld; jljohnson; eodell; jjohn; KGillette-Hoskins; shunyeung; qwestosscm; willia; Osborne-Miller,Donna - NCAM; fred.brigham; lisa.mcnabola; rae.couvillion; anthony_steiner; carol.l.waggener; scott_simon; lmwagner; jmoham; ronaldg; Finney, Michelle; blittler; Boykin,Timothy (Tim) - NCAM; mzulevic; pbewick; Rea,Ervin E - NCAM; lbendixsen; Scherer,Esther A - NCAM; Van Meter,Sharon K - NCAM; loy; audrey; bparks; klstichter; kisua.wright; steve.moore; wk4736; Menezes,Mitchell H - LGA; thomas.f.dixon; delynn.ball; becky.quintana; Bahner,Teresa L (Terry) - NCAM; rd5335; mdoberne; leilani.jean.hines"; mcutcher; Don Petry; lynda.a.cleveland; susan.a.travis; wmcampb; phooksj; jlthomp; lihle; sburson; emorris; Dave Hahn; Alan Zimmerman; lgwood2; mrouth; Jill Fouts; Debra Smith; Lori Simpson; Margaret Bumgarner; Tommy Thompson; Jarby Blackmun; Chris Viveros; Nancy Lubamersky; Jean Liston; Sandy Maffei; Valerie Jeffries; Wastor@Aol.Com Astor; Jill Anderson; Catherine Barrett; Joann Beck; Lynne Lemon; Wendy Green; btgutie; Russell Urevig; Mallory Paxton; Kathy Battles; Connie Winston; ambinkl; Judith Schultz; Nancy Hoag; Harriett Berry; Debra Kelso; cmeride; Joan Smith; Jim@qwest.com; James Maher; Christie Doherty; Richard Martin; Carol Zimmerman; Elizabeth King; Joann Garramone; Judy Madden; drwillee; Dave Hahn; Dave Hahn; jamoor2; clwarr1; swillgu; scowley; jhousto; lsolive; jvilks; dschlos; csanphy; chalper; jbarkle; cpokran; Henry Rodighiero; lkjohn3; mja506; Mark Miller; Patricia Levene; Steven Kast; jamoor2; jrixe; clwarr1; swillgu; dchapli; dfcross; begbert; Rosemarie Ferris; mxflore; sllox; sgreenh; Sue Gwin; phahn; Ryan Hinkins; jhousto; pjenkin; glawson; poconne; lsolive; epeters; kpettey; crau; dxreed2; lmrobe1; mroll; jsquyre; ezatkow; dotaylo; jvilks; rvirlee; twalter; bwaterh; rkwhit2; frwrigh; mxyamas; Joan Masztaler; Julie Kaufman Prentice; Peter Budner; William Woodworth; Lisa Schuzer; Paula Rozzi; Brenda Lewis; tmckenz; Christine Quinn-Struck; Doug Slominski; Nancy Shepherd; Eric Yohe; pjjohns

Subject: Qwest Final CR Responses

All -

Please find the following final Qwest CR Responses. These should be web posted by COB on Tuesday 11/13/01 at the following URL: http://www.uswest.com/wholesale/cmp/changerequest_pp.html Please let me know if you have any questions.

CR #5608142 - LNP Repair Interval
CR #5582099 - LNP Switch Disconnect Timing
CR #5579345 - Repair Process for multiple lines on a single report

Matt Rossi
CMP Manager - Product/Process
303 896-5432

Qwest.
ride the light

Wholesale Markets

November 9, 2001

Mr. Jim Thiessen

Avista Communications

This letter is in response to your CLEC Change Request Form, number 5608142 dated June 13, 2001 – LNP Repair Interval.

Request:
Currently, Qwest has a 24-hour commit time for all LNP trouble tickets that are opened. These tickets can be escalated every ½ hour, but all the escalation does is guarantee that the ticket will be worked within 24 hours. Would like to see this reduced to a more reasonable amount of time.

Response:
Repair intervals were agreed to at the performance measurement workshops under the auspices of the Regional Oversight Committee (ROC) and the Arizona TAG. MR-11 LNP Trouble Reports cleared within 24 hours was established as a measure of the interval agreed upon. The standard is parity with MR-3C Results for Retail Residence. Qwest will continue to be consistent with these agreements.

Qwest Call Center Agents will review any pending order information for accuracy and establish contact with the appropriate repair center, if necessary. The ISC will issue a work queue ticket and agree to provide regular status to the CLEC at regular intervals until resolution.

Sincerely,

Maureen Callan
Group Product Manager

Qwest
ride the light

Wholesale Markets

November 9, 2001

Ms. Terry Bahner
Ms. Donna Osborne-Miller

AT&T

This letter is in response to your CLEC Change Request Form, number 5582099
dated June 6, 2001 – LNP Switch Disconnect Timing.

Request:
Change current switch disconnect process to where disconnect occurs
immediately after AT&T Broadband activates the number.

Response:
Qwest understands the goal is to eliminate disconnection of customers in error.
Qwest has agreed to Performance Measurement OP-17 - Timeliness of
Disconnects Associated with LNP Orders with a standard of 98.25%. Qwest is in
full support of this measure and has committed to this standard.

In August, Qwest completed the mechanization of the solution to hold the switch
translations and the service orders until 11:59 P.M. of the next business day after
the port due date. Initial analysis of internal data from before and after the
implementation indicates a 73% reduction in loss of dial tone and an 84%
reduction in workbacks.

Qwest did evaluate several vendor proposals outlining a system solution to time
the switch disconnect with the port activation. Qwest believes that our current
process and recent system mechanization has provided a reliable and stable
platform for the completion of port orders. As a result of the analysis of the
vendor proposals, and the service improvements from our own internal system
changes; we will not be pursuing any additional system enhancements. No
further action is planned.

Sincerely,

Maureen Callan
Group Product Manager

ride the light

Qwest.

Wholesale Product Marketing

November 7, 2001

Kathy Stichter
ILEC Relations Manager
Eschelon Telecom, Inc

CC: Matthew Rossi

RE: CR #5579345 – Repair process for multiple lines on single report.

This letter is in response to your CLEC Change Request Form #5579345 dated June 6, 2001. It includes the updates that were agreed to in a joint meeting held with Qwest and Eschelon on September 10, 2001.

Qwest is providing procedures detailed in this letter to address multiple circuits on a single trouble ticket. Credit for circuit outages are also addressed.

- Change Request: "Repair process for multiple lines on single report Develop a consistent repair process for receiving information about multiple lines for a single customer on a single report, without the use of facsimiles. In some instances, when Eschelon calls Qwest about a repair issue for a multiple-line account, Qwest will require Eschelon to call regarding the main line and then send information regarding the subsequent lines by facsimile. This is time consuming and inefficient for both parties. In other cases, the Qwest representative will take the information over the telephone for all of the lines. The latter approach is more efficient. In any case, a consistent approach is needed so that Eschelon may adequately train its employees in the proper procedure."

Qwest Response:

Qwest has developed a process for handling multiple ticket requests which will provide an option to the CLECs to either fax multiple requests or remain on line with the Repair Employee while the tickets are submitted.

Related "Trouble"

For Wholesale, Non-Design and Design Services, *including Unbundled Loops*, multiple trouble reports will be accepted on a single repair ticket *if* all three (3) of the following criteria are met:

- Same, exact trouble on each line, i.e. *static on TN 333-333-3333, 333-333-3334 and 333-333-3335.*
- Same end user location
- Same customer name for end user

There is a restriction on Design Services, *including Unbundled Loops;* trouble reports of five (5) cases of trouble per single repair ticket. No restrictions exist for Non-Design Services.

Unrelated "Trouble"

If the CLEC answers "no" to any of these three questions, then individual trouble reports must be submitted.

One trouble ticket will be issued for each separate case of trouble. Qwest will offer the option to the CLEC to input one case of trouble and fax the additional cases of trouble to Qwest. The ticket number from the first case of trouble must be on the fax to be used as a cross-reference on all other cases of trouble. If the CLEC chooses not to fax additional cases of trouble, the CLEC may remain on the line with the Repair Employee to submit all trouble tickets.

The CLEC is responsible to isolate trouble to a specific line when multiple lines exist for a customer at one location. If the CLEC requests, Qwest will perform the trouble isolation and appropriate charges will apply.

Credits for Circuit Outages

Qwest currently uses the WFA (Work Force Administrator) system for all trouble reporting. It was designed to only handle a single circuit per trouble report. Consequently, credits for circuit outages are limited to a single circuit per trouble report. The CLEC may request individual tickets to ensure credit, as appropriate, for each affected circuit.

Qwest is willing to assist Eschelon or any other CLEC in the preparation of a system Change Request that would investigate options to modify WFA to correct current deficiencies in the system for providing credits for more than one circuit.

Sincerely,

Cheryl McMahon
Senior Process Analyst

From:	Powers, F. Lynne [flpowers@eschelon.com]
Sent:	Wednesday, December 05, 2001 2:35 PM
To:	'Judith Schultz'
Cc:	'Ford, Laura'; 'Jim Maher'; 'mzulevic@covad.com'; Bahner,Teresa L (Terry) - NCAM; 'Liz Balvin'; 'Tom Dixon'; 'Megan Doberneck'; 'Evans, Sandy'; 'Gindlesberger, Larry'; 'Hines, LeiLani'; 'Lee, Judy'; 'Littler, Bill'; 'Lees, Marcia'; Menezes,Mitchell H - LGA; Osborne-Miller,Donna - NCAM; 'Quintana, Becky'; 'Rossi, Matt'; Stichter, Kathleen L.; 'Thiessen, Jim'; 'Travis, Susan'; Van Meter,Sharon K - NCAM; 'Wicks, Terry'; 'Woodcock, Beth'; 'Yeung, Shun (Sam)'; 'Mark Routh'; Clauson, Karen L.
Subject:	Escalation regarding Qwest's additional testing CR, #PC100101-5

escalationTesting.doc

            Eschelon, Covad, and Allegiance initiate an escalation with respect
to Qwest's additional testing CR, #PC100101-5. The completed escalation
form is enclosed in Word format. (The web-based format didn't work well for
this joint escalation.)
    Because this issue has been discussed in re-design, we are copying
the re-design participants as well, for their information.

Lynne Powers
Executive Vice President
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612-436-6642
flpowers@eschelon.com

Terry Wicks
CLEC Account Manager
Allegiance Telecom, Inc
469-259-4438
terry.wicks@algx.com

Michael Zulevic
Director-Technical/Regulatory Support
Covad Network Planning and Capacity Mgmt.
520-575-2776
mzulevic@Covad.COM

>   <<escalationTesting.doc>>
>

CMP Escalations and Dispute Submittal Form
Items marked by a red asterisk (*) are required.

* **CLEC Company Name:**

This escalation is submitted jointly by:

Eschelon Telecom, Inc.
Covad Communications
Allegiance Telecom Inc.

Referred to jointly as "CLECs."

* **Action Type:**
- select an action type –

Escalation

Entering a change request number is optional, but you are required to select a status (select "no change request number" if you choose not to enter a number). Change Request Number:

CR #PC100101-5

Change Request Status:
- select one - no change request number Submitted Clarification/Evaluation Presented Implementation CLEC Test Completed

CLECs believe that the appropriate status is "Denied" by CLECs. Qwest has listed the status as "Development."

NOTE: (Status choices on web need to be revised to include "denied" and "development.")

* **Description:**

> Qwest provided this description of the CR: "Currently, CLECs' are responsible for testing UNE's prior to submitting a trouble report to Qwest. CLECs' are to provide test diagnostics including specific evidence that the trouble is in the Qwest Network along with the associated Qwest circuit identification number. If the CLEC elects not to perform the necessary UNE testing, Qwest will offer to do such testing on CLECs' behalf. If such testing is requested by the CLEC, Qwest will perform the additional testing and bill the CLEC the appropriate charges that are in their Interconnection agreement.
> If the CLEC does not provide test diagnostics and elects not to have Qwest perform additional testing on their behalf, Qwest will not accept a trouble report. Additional

Charges may apply when the testing determines the trouble is beyond the Loop Demarcation Point This additional testing option is available on the Unbundled Loop Product Suite, Unbundled Dedicated Transport (UDIT), Enhanced Extended Loop (EEL) and Loop Mux."

* History of Item:

Qwest provides the following status history in its Interactive Report (*see* http://www.qwest.com/wholesale/downloads/2001/011203/CLEC_CMP_ProductProcess _Interactive_Report.PDF):

"10/01/01 - CR received by Deb Smith of Qwest
10/01/01 - CR status changed to Submitted
10/01/01 - Updated CR sent to Deb Smith
10/17/01 - CMP Meeting: Qwest presented "Description of Change" and agreed to provide detailed package for CLEC review.
Walk through meeting to be scheduled by Qwest in the late October/early November 2001 time frame.
10/31/01 - CR presented to the participating CLECs at the Redesign Session. CLECs to provide comments.
11/08/01 - Qwest Notification (Document No. PROD.11.08.R.00197.Mtce&Repair Language; Subject: Update to Product
Information on Maintenance and Repair Language within EEL, UDIT, LMC and Unbundled Loop General) transmitted to CLEC"

Eschelon provided Qwest with the following summary on 12/3/01:

" . . . . We have objected to this CR on several occasions. Other CLECs have objected as well. Terry Wicks of Allegiance has said that, at a minimum, there are too many unanswered questions at this time to implement it. There is no acceptance or consensus from CLECs. (Eschelon does not believe that rates can be established through a CR.) Yet, Qwest has said that it would implement the CR on December 1st. While we can continue to deal with the process issues raised by this approach in Re-Design, today is December 3rd, so we need to know ASAP that this particular CR has not been implemented (or, if implemented, in which states). Qwest does not have the authority to implement the rates in this CR in all states and circumstances described or to refuse trouble tickets, at least as to Eschelon (and others that have opted in to the same AT&T/WCOM contracts). Because it appears that Qwest plans to show the charges on the bill as "miscellaneous" charges, the charges will be difficult, if not impossible, to identify. We need to ensure that no unauthorized charges are placed on our bill. **Please let us know what activities were taken pursuant to this CR and what steps have been taken to ensure that unauthorized charges will not appear on our bill.**
As we discussed, Qwest did not provide citations to any interconnection agreements in its CR. Terry Wicks said at last week's re-design meeting that, when Qwest presented its CR at the CMP meeting, he asked whether Qwest had reviewed all contracts to be sure that all interconnection agreements required the process and rates in

the CR. Terry said that Qwest said it had done so. Eschelon asked Qwest to provide the citations to all of its contracts upon which Qwest relied for its CR. At a later meeting, Qwest agreed to do so. Qwest was later able to provide citations to interconnection agreements for only 3 of the 6 states in which Eschelon has switches (*see* email, copied at end of this email, from Dennis Pappas of Qwest). The rates cited are from the collocation sections of the rate attachments, and it is at least unclear that these rates were intended to apply to this situation. Moreover, the cited interconnection agreement language refers to a trouble isolation charge. It appears that Qwest plans to charge a testing charge, in addition to a trouble isolation charge, in some circumstances. For a fourth contract (Colorado), Qwest provided a citation to language but said "the rates were not noted in your ICA." (*See* email copied below.) Qwest provided no language or rates for MN or OR. Although the CR specifically states that Qwest will "bill the CLEC the appropriate charges that are in their Interconnection agreement," Qwest said on telephone and conference calls that it plans to charge CLECs retail or SGAT rates when a rate is not in the interconnection agreement. (Qwest's rates and basis for charging rates should be formally documented and not gathered from telephone conversations.) Qwest has provided no basis for charging Eschelon retail or SGAT rates, nor does Eschelon agree that those rates apply to Eschelon (which has not opted in to an SGAT). Moreover, Eschelon also provides testing in similar circumstances, and Qwest has not indicated that it intends to pay Eschelon for that testing. If Qwest can charge this rate, Eschelon should also be able to charge Qwest, particularly when Eschelon has to dispatch a technician to prove to Qwest that the trouble is in Qwest's network. Nonetheless, Dennis Pappas of Qwest has said that Qwest will not pay CLECs for providing the same services. Eschelon disagrees.

As Eschelon has previously indicated to Qwest, for the three interconnection agreements for which Qwest provided citation to language and rates (AZ, UT, WA), Eschelon does not agree that the language necessarily applies in the way that Qwest plans to implement it. For example, none of the contract language states that Qwest may refuse to accept a trouble ticket without test results, but Qwest's CR says that it will do so (and, in fact, Qwest has already started doing so, according to participants at the re-design meeting). The number of questions that CLECs have raised in meetings and conference calls is a reasonable indication that the documentation provided by Qwest to date is inadequate. Also, if Qwest is applying the testing process and charges consistently with interconnection agreements (and only when authorized by interconnection agreements, it is unclear why a CR was necessary. What is the "change" that Qwest is requesting?

At last week's re-design meeting, Michael Zulevic of Covad said that the CR is *also not consistent with the SGAT language on this issue. I am not familiar with that issue*, so I suggested to you on a break that you should follow up with him on that. Eschelon has not opted in to the SGAT.

As we have discussed with Qwest, Eschelon already performs testing. While it plans to continue doing so, its greatest objections to this CR are the rates, the manner in which Qwest plans to show the information on the bill (which is not specific enough for verification of charges), and the way this CR/process has been handled. Eschelon does not want it to set a precedent suggesting that this is acceptable going forward.

Many issues remain disputed, unanswered, or unclear. The interconnection agreement language cited by Qwest specifically requires the parties to work

"cooperatively." As we discussed at the re-design meeting, the process used for collocation decommissioning has aspects that could be used as a model in the future for cooperatively reaching agreement. In the meantime, however, Eschelon's immediate concern is ensuring that this CR is not implemented inappropriately. Please let me know what Qwest has in place today and, if this CR has not been suspended, whether it will be.

EMAIL FROM DENNIS PAPPAS OF QWEST:

[NOTE: Dennis called Garth Morrisette of Eschelon to indicate that the "critical sentence," referred to below, was that Qwest is relying upon tariffs for the rates not found in the contracts. On separate calls, Qwest has said that, if there is no rate in the interconnection agreement, Qwest will charge the SGAT rate. Eschelon has not opted in to the SGAT.

With respect to the citations to language below (except rates), the cites below are from Attachment 5 to the interconnection agreements."]

-----Original Message-----
From: Dennis Pappas
Sent: Wednesday, November 14, 2001 3:55 PM
To: Morrisette, Garth M.
Subject: Re: Optional Testing Response

Call me at your convience, there is a critical sentence that I left out that I need to clarify. Thanks!

"Morrisette, Garth M." wrote:

Thanks Dennis - I'll review this and call you or our account team if I have questions.

Garth.

-----Original Message-----
From: Dennis Pappas
Sent: Wednesday, November 14, 2001 2:19 PM
To: gmmorrisette
Subject: Optional Testing Response

Good afternoon Garth

Just a recap for you. The language mentioned during our meeting was in AZ, UT and WA. In all three agreements, 3.2.17 spoke to responsibility for trouble resolution and 6.2.20.1.1 speaks to the billing of charges depending on where the trouble was isolated.

In CO, the language is in sections 5.1.17, 5.1.25 and 5.2.20.

The rates associated with these sections in AZ is in schedule 1 - attachment 1 under Common elements. Maintenance 1/2 hour increments - Regular is $22.20 for each 1/2 hour and Overtime is $31.57 for each ½ hour.

Rates in the UT and WA agreement are noted as "Maintenance Labor" and are - Basic $26.97 / Overtime $35.87 in UT and Basic $25.36 / Overtime $33.73 in WA.

Language existed in CO but the rates were not noted in your ICA. In this instance, we referenced the Tariff to get rates for Basic, Overtime and Premium "Additional Labor other" of $28.91, $38.61 and $48.33 respectively.

Call me with any questions or contact your Account Team representative for additional details. Thank You

Dennis Pappas - Product Manager"

Allegiance provided the following information on 12/3/01:

"Allegiance Telecom has strong concerns regarding Qwest's implementation of the Additional Testing CR and insists that Qwest suspend implementation of Additional Testing charges until Qwest demonstrates the needs for such charges and terms, rates, and conditions for Additional Testing are mutually agreed to by both parties. As Terry Wicks has been stating in the CMP meetings, Allegiance is concerned about numerous unanswered questions concerning the Additional Testing CR, including the rates that Qwest is proposing to charge and the manner in which those rates would be included on an invoice. Since Qwest has not adequately responded to Allegiance's and other CLEC's repeated requests for clarification of this process, Allegiance requests that this CR be immediately suspended and that Qwest clarify the terms, rates and conditions it is proposing for such testing.

It is Allegiance's position that rates must be contained in an effective tariff or an interconnection agreement. Thus, until such time as Qwest has clearly articulated the terms, rates and conditions for Additional Testing and our companies have concluded an amendment or Qwest has an effective tariff, Allegiance can not be held liable for any charges for Additional Testing."

Covad provided the following information to Qwest on 12/4/01:

"I could not agree more strongly with Karen on the issue of additional testing. As I stated at last week's meetings, not only does Covad find the proposal made by Dennis Pappas and Bill Campbell unacceptable, but it is also inconsistent with the language negotiated during the SGAT 271 workshops. This is exactly the kind of unilateral action historically taken by Qwest that has led to the need to redesign the Change Management Process. It was my understanding that the proposal was being tabled and re-thought and that Qwest would seek agreement with CLECs through the

Change Management Process prior to implementation. I sincerely hope this is still Qwest's plan."

* Reason for Escalation / Dispute:

Qwest has denied the request of CLECs to suspend the CR at least while clarifying the unanswered questions and attempting to gain consensus when possible. Implementation of the CR violates interconnection agreements with CLECs. Many questions remain unanswered. Escalation is urgent, because Qwest has already implemented the CR over CLECs' objections. With so many unanswered questions, CLECs cannot even determine exactly what has been implemented and whether their individual interconnection agreements are being handled differently. Also, because of the manner in which Qwest is handling the billing of the charges per this CR, bill verification is difficult if not impossible.

CLECs believe that Qwest should be the party responsible for initiating an escalation in this case, because Qwest did not clarify the process and was unable to gain CLEC consensus or approval before implementing its CR. Because Qwest has not initiated the escalation, however, CLECs initiate this escalation.

* Business Need and Impact:

For all of the reasons stated above and in meetings and conference calls on this issue, the business need/impact associated with this CR is substantial. This is particularly true because of the potential precedent set by this CR for the handling of future CRs and implementation of rates.

* Desired CLEC Resolution:

Suspend implementation of Qwest-initiated CR #PC100101-5 (process and rates).

Review any steps that Qwest has taken to make system changes, train people, or otherwise implement this CR universally at Qwest to ensure compliance with particular interconnection agreements (e.g., interconnection agreements with Eschelon, Covad, and Allegiance in each state). This includes re-training, etc., as to the differences among various interconnection agreements, as well as difference from the SGAT. (Eschelon, Covad, and Allegiance each has an interconnection agreement with Qwest, and none of these CLECs has opted into the SGAT.)

Provide documentation showing that Qwest has trained its personnel and taken other steps to ensure compliance with individual interconnection agreements, including differences in those agreements as compared with the SGAT.

Begin a collaborative effort (similar to that used for collocation decommissioning) to develop an improved process and, when possible, gain consensus before implementation.

Ensure that part of the process is to provide accurate bills that reflect interconnection agreement rates and provide sufficient information for bill verification. If no consensus can be reached, Qwest should then be responsible for escalation before implementation.

Ensure reciprocity so that CLECs may recover their costs in the same circumstances in which Qwest is allowed to recover its costs for such testing.

CLEC Contact Information

Allegiance:
Terry Wicks
LEC Account Manager
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469-259-4438
terry.wicks@algx.com

Covad:
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Eschelon:
Lynne Powers
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Exhibit I

Qwest Proposed Production Support Language – ~~10-22-01~~11-27-01

~~**I.1.1TYPES OF CHANGE**~~

~~The change request should fall into one of the following classifications:~~

~~I.1.1.1.1.1.1.1Type 1 (Production Support) Change~~
I. Production Support

I.1 Newly Deployed Changes
Following the ~~implementation~~ release production date of an OSS Interface change, Qwest will use existing production procedures for maintenance of a newly released software. Problems encountered by the CLEC should be reported to the IT Wholesale Systems Help Desk. Qwest will monitor, track, and address troubles reported by CLECs. ~~to the IT Wholesale Systems Help Desk.~~ A week after the deployment of an IMA Released ~~software~~ into production, Qwest will host a conference call with the CLECs to review any identified problems and answer any questions pertaining to the newly deployed software. Qwest will follow CMP process for documenting the meeting (includes issues/action items and status/solutions). Issues will be addressed with specific CLECs and results/status will be reviewed at the next Monthly OSS CMP Meeting. ~~A Type 1 change corrects problems discovered in production versions of an OSS interface.~~
Severity 1 (critical—production stopped) and Severity 2 (production or functionality degraded) corrections ~~to software problems~~will be implemented immediately by means of an emergency release of process, software or documentation and CLECs notified according to the IT Wholesale Systems Help Desk procedures (refer to CMP web site). Severity 3 (limited use, but workaround in place) and Severity 4 (low or no impacts to CLECs) types, will not be fixed immediately but will following the CR process under this CMP.

I.2 Request for a Production Support Change
For Severity 3 and Severity 4 production support issues, e~~E~~ither Qwest or a ~~the~~ CLEC may initiate the change request to correct the Severity 3 or Severity 4 problem. (See Section X for CR Initiation.) Typically, this type of change reflects instances where an ~~technical~~ implementation is faulty or inaccurate such as to cause correctly or properly formatted data to be rejected. Instances where Qwest or CLECs misinterpret_~~interface~~ specifications and/or business rules must be addressed on a case-by-case basis. All parties will take all reasonable steps to ensure that any disagreements regarding the interpretation of a new or modified ~~business process~~OSS Interface are identified and resolved during the change management review of the change request.

The IT Wholesale Systems Help Desk supports Competitive Local Exchange Carriers who have questions regarding connectivity, outputs, and system outages. The Help Desk serves as your first point of contact for reporting trouble. If the Help Desk is unable to assist you, they will refer information to the proper subject matter expert, also

Exhibit I

known as Tier 2 or Tier 3 support, who may call you directly. Often, however, an IT Wholesale Help Desk representative will contact you to provide information or to confirm resolution of your trouble ticket. (see Action Item # 189)

1.3 Reporting Trouble to IT

Qwest will open a trouble ticket at the time the trouble is first reported by CLEC or detected by Qwest. The IT Wholesale Systems Help Desk representative will communicate the ticket number to the CLEC at the time the CLEC reports the trouble. (Action Item #191)

1.4 Severity Levels

Severity level is a means of assessing and documenting the impact of the loss of functionality to CLECs and the impact to the business. The severity level gives restoration or repair priority to problems causing the greatest impact to CLECs or business.

The guidelines for determining severity levels are listed below. Examples of some trouble ticket situations follow. Please keep in mind these are guidelines, and each situation is unique. The IT Wholesale Systems Help Desk representative will make the determination of the severity level based on the individual situation and will communicate the severity level and the ticket number to the CLEC at the time the CLEC reports the trouble. If the CLEC disagrees with the severity level assigned by the IT Help Desk personnel, the CLEC may escalate using the Technical Escalation Process. (See section X)

SEVERITY 1: CRITICAL IMPACT

- Critical.
- High visibility.
- A large number of orders or CLECs are affected.
- Affects online commitment.
- Production or cycle stopped – priority batch commitment missed.
- Major impact on revenue.
- Major component not available for use.
- Many and/or major files lost.
- Major loss of functionality.
- Problem can not be bypassed.
- No viable or productive work around available.

Examples:

- Major network backbone outage without redundancy.
- Environmental problems causing multiple system failures.

Exhibit I

- Large number of service or other work order commitments missed.
- A software defect in an edit which prevents any orders from being submitted.

SEVERITY 2: SERIOUS IMPACT

- Serious.
- Moderate visibility.
- Moderate to large number of CLECs, or orders affected.
- Potentially affects online commitment.
- Serious slow response times.
- Serious loss of functionality.
- Potentially affects production – potential miss of priority batch commitment.
- Moderate impact on revenue.
- Limited use of product or component.
- Component continues to fail. Intermittently down for short periods, but repetitive.
- Few or small files lost.
- Problems may have a possible bypass; the bypass must be acceptable to CLECs.
- Major access down, but a partial backup exists.

Examples:

- A single company, large number of orders impacted
- Frequent intermittent logoffs.
- Service and/or other work order commitments delayed or missed.

SEVERITY 3: MODERATE IMPACT

- Low to medium visibility.
- Low customer, or order impact.
- Low impact on revenue.
- Limited use of product or component
- Single client device affected.
- Minimal loss of functionality.
- Problem may be bypassed; redundancy in place. Bypass must be acceptable to CLECs.
- Automated workaround in place and known. Workaround must be acceptable to CLECs.

Example:

- Equipment taking hard errors, no impact yet.

Exhibit I

SEVERITY 4: MINIMAL IMPACT

- Low or no visibility.
- No direct impact on customer.
- Few functions impaired.
- Problem can be bypassed. Bypass must be acceptable to CLECs.
- System resource low; no impact yet.
- Preventative maintenance request.

Examples:

- Misleading, unclear system messages causing confusion for users.
- Device or software regularly has to be reset, but continues to work.

1.5 Ticket Response Intervals

Ticket Response Intervals are based on the severity level of the ticket. "Response Interval for any Change in Status" means that a status notification will be sent out within the time specified from the time a change in status occurs. "Response Interval for No Change in Status" means that a status notification will be sent out on a recurring basis within the time specified from the last status notification when no change in status has occurred, until resolution. "Response Interval upon Resolution" means that a status notification will be sent out within the time specified from the resolution of the problem. Any status notifications will be sent to all affected CLECs. The affected CLEC(s) and Qwest will attempt to reach consensus on resolution of the problem. When no consensus is reached, any party may use the Technical Escalation Process described in section X.

Status notification will be provided during the IT Wholesale Systems Help Desk normal hours of operation. Qwest will continue to work severity 1 problems outside of Help Desk hours of operation which are Monday-Friday 6:00 a.m. - 8:00 p.m. Mountain time and Saturday 7:00 a.m. - 3:00 p.m. Mountain time,
and will communicate with the affected CLEC(s) as needed. A severity 2 problem may be worked outside the IT Wholesale Systems Help Desk normal hours of operation on a case-by-case basis.

The chart below indicates the response intervals a CLEC can expect to receive after reporting a trouble ticket to the IT Wholesale Systems Help Desk.

Severity Level of Ticket	Response interval for initial ticket	Response Interval for any Change in Status	Response Interval for No Change in Status	Response Interval upon Resolution
Severity Level 1	Immediate acceptance	Within 1 hour	1 hour	Within 1 hour
Severity Level 2	Immediate acceptance	Within 1 hour	1 hour	Within 1 hour
Severity Level 3	Immediate	Within 4 hours	48 hours	Within 4 hours

Exhibit I

	acceptance			
Severity Level 4	Immediate acceptance	Within 8 hours	48 hours	Within 8 hours

Type 1 changes will be processed on an expedited basis by means of an emergency release of software/documentation.

Additionally, once a Type 1 change is identified, the change management team (see the Managing The Change Management Process section) must determine the nature and scope of the maintenance. Type 1 changes are categorized in the following manner:

Severity 1: Production Stopped: Interface Unusable — Interface discrepancy results in totally unusable interface requiring emergency action. CLEC Orders/Pre-Orders cannot be submitted or will not be accepted by Qwest and manual work arounds are not feasible. Correction is considered essential to continued operation. Qwest and CLECs should dedicate resources to expedite resolution.

> Acknowledgment Notification = 1 hour
> Status Notification = bi-hourly

Severity 2: Production Degraded: Interface Affecting — An interface discrepancy that requires a work-around(s) on the part of the CLEC or Qwest. The change is considered critical to continued operation. It does not stop production, but affects key applications.

> Acknowledgment Notification = 4 hours
> Status Notification = weekly
> Implementation time = 14 - 30 calendar days

Severity 3: Process Impacted: Pre-order / Order requests can be submitted and will be accepted through normal processes / interfaces. Clarification is considered necessary to ongoing operations.

> Acknowledgment Notification = 7 calendar days
> Implementation time = 30 - 60 calendar days

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

Revised—November 29, 2001

#	Issue/Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
13G	Action	August 8 Meeting	CMP Web Site	Re-visit the redlined CMP framework element, "Qwest Wholesale CMP Web Site" at a later working session.	Core Team	Sep 20 Extended to Nov 13 Nov 27-29 TBD	Re-visit this element to insure all items are addressed in the re-designed CMP framework.
40	Issue	August 14 Meeting	Notifications	Are Call Center outages included in the "outages" sub-category – should they be?	Qwest – Judy Schultz	Sep 5 Extended to Sep 20 Oct 15 Nov 1 Nov 13 Nov 27-29 Dec 10-11	Qwest will provide notice on the process via mail-out 10/29: Posted on CMP Redesign web site—"Qwest Center Outage Notification Process-Posted 10-29-01" 11/29: Terry Bahner/ATT to review and core team to close on 12/10.
42	Action	August 14 Meeting	Notification	Investigate how notifications are done for Network outages, including a paging broadcast capability. 9/5: Does the SGAT language pertaining to method of notification for Network outages need to revised based on Qwest practice?	Qwest – Jim Maher Andy Crain	Sep 6 Extended to Sep 18 Sep 20 Oct 2, 16 Nov 1, 13 Nov 27-29 Dec 10-11	Related to Item #66 Beth Woodcock to contact Andy Crain to provide information at the Oct 30 Nov 1 next session. 11/29: Andy Crain to clarify at next session. Jim Maher to confirm paging process for Network Outages.
68	Action	Sep 6 Meeting	271 Workshop 18 COIL Items	Review the 18 items and verify that they will be addressed in the CMP re-design	Core Team	On-going	See Item #176
69	Action	Sep 6 Meeting	Qwest Status Report	Review red lined document and Qwest status report prior to scheduled filing. 9/18: Qwest to provide documents to participants no later than Sep 27 for review. 10/2: Qwest will continue to provide	Core Team	On-going	Andy Crain to distribute documents no later than Sep 27 for re-design team review prior to Oct 2 meeting. Will visit at each meeting. Qwest will update filing status at Dec

CLEC-Qwest Change Management Re-design Working Sessions

Core Team Issues/Action Items Log—OPEN

Revised—November 29, 2001

#	Issue/Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				documents to redesign team for review prior to filings.			10th meeting.
70	Issue	Sep 6 Meeting	CLEC Review of Tech Pubs and PCAT Changes	What is Qwest's proposal for CLECs to review and provide comments to notices on Tech Pub and PCAT changes – what is the role of the CMP group (monthly) in these proposed changes? 10/16: Issue remains open until the interim process is implemented.	Qwest – Judy Schultz	Sep 18 Extended Sep 20 Oct 2-3 Oct 16 Until Deployed	Susie Bliss will provide overview of the process at the Sep 19 CMP product/process meeting. Defer until discussion on Scope is scheduled. Scheduled call on October 5 – Susie Bliss. Minutes posted to Redesign website 10-29-01
88	Action	Sep 18 Meeting	CMP Process	Propose language for "proprietary CR"	Core Team	Sep 20 Extended Oct 3, 16 Nov 1 TBD	Related to #89
89	Issue	Sep 18 Meeting	CMP Process	What is the process for a CLEC-originated CR deemed proprietary and a process to handle proprietary CLEC questions and comments?	Core Team	Oct 3 Extended Oct 16 Nov 1 TBD	Related to #88 Issue reworded on Oct 30 to address proprietary CLEC questions and comments.
93	Action	Sep 18 Meeting	Exception Process	What is the process for an Exception item during prioritization?	Core Team	Sep 20 Extended Nov 1 TBD	
94	Issue	Sep 20 Meeting	CR Process	How will the CR Process address 'draft' industry guideline changes?	Core Team	Oct 3 Extended Oct 16 Nov 1 TBD	

CLEC-Qwest Change Management Re-design Working Sessions

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#	Issue/Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
100	Action	Sep 20 Meeting	Schedule Working Sessions	Determine the elements for CMP Product/Process	Core Team	Oct 16 Extended Nov 13 TBD	Related to #176 Core Team to do some pre-meeting work to determine additional elements for Product/Process.
104	Action	Oct 2 Meeting (Meagan – Covad)	Parity in changes	Who has responsibility for determining whether or not a change in retail is CLEC impacting and requires notification via the CMP process	Qwest – Judy Schultz	Oct 16 Extended Nov 1 Nov 13 Nov 27-29 Dec 10-11	Related to #105—to be closed after Core Team reviews sample retail mail-outs. 11/29: Need to review Mitch/AT&T questions on insuring parity between retail and wholesale. Add to agenda for the Dec 10-11 session.
105	Action	Oct 2 Meeting (Dixon – WCom)	Parity	Provide training package and check list used by Qwest to train retail in identifying changes that impact CLECs Provide sample mail outs for retail changes – (Retail only change and Retail CLEC impacting change) Code of Conduct – what is the disciplinary action when guidelines – (includes compliance) are not adhered to	Qwest – Judy Schultz	Oct 16 Extended Nov 1 Nov 13 Nov 27-29 Dec 10-11	This is replaces # 95; related #104 Option 1 – Qwest sends everything Option 2 – Qwest screens notification to only CLEC impacting changes 10/16 COMPLETED: This checklist is on the web on the CMP re-design web site under Re-Design documentation 11/1: Examples of mail outs for retail changes are posted on the web site and shared as hand-out at the 11/13 session. 11/29: Need to review Mitch/AT&T questions on insuring parity between retail and wholesale. Add to agenda for the Dec 10-11 session.
106	Action	Oct 2 Meeting	Definition of terms	Define terms used in Paragraph 2 in the body of the document (scope and introduction) and in the glossary of terms table on page 41 of the Master Red lined document. What is OBF's definition?	Core Team	Ongoing	Terms: Design, Development, Notification, Testing, Implementation and Disposition

CLEC-Qwest Change Management Re-design Working Sessions
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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
107	Action	Oct 2 Meeting	Scope—Roles and Respon.	Define "Roles and Responsibilities" of Qwest and CLEC representative/s as it appears on Paragraph 3 of the Scope 11/1: Define responsibility for a primary and secondary POC and a CMP Team Representative.	Core Team	~~Nov-1~~ TBD	Reference language under Administration per OBF structure, or Managing the CMP
108	Action	Oct 2 Meeting	PCAT – Tech Pub Notification	Research tech pubs and PCAT changes that have been released thus far as they relate to 271 workshop commitments Provide a list of notifications that are to be released 10/16: Can Qwest improve the delivery timeframe for previously released changes to PCAT and Tech Pubs? 11/29: Do the CLECs still want Qwest to do retroactive red lining? Is Qwest able to do retroactive red lining on Tech Pubs?	Qwest – Judy Schultz	~~Oct-16~~ Extended ~~Nov-1~~ ~~Nov-13~~ Dec 10-11	Also present at the Oct 17 CMP Product/Process meeting 10/16: Already released PCAT changes will be highlighted in Green and will be available March 2002 (estimated 3 months of work).
110	Action	Oct 3 Meeting	Terms: CLEC Operating Procedures	Define "CLEC operating procedures" under Terms table in master redline document. 11/1: Subcommittee will provide the Core Team with an expanded definition for CLEC impacting	~~Qwest— Andy Crain (Susie Bliss)~~ Core Team	~~Oct-16~~ ~~On-going~~ ~~Nov-13~~ Nov 27-29	Will be discussed offline on Oct 5 – Susie Bliss (develop checklist) 10/16: Define the term "operating procedures" at a later session. 11/1: Subcommittee (Judy Schultz, Terry Bahner, Terry Wicks, Liz Balvin.

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#	Issue/Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				besides the current 4 items.	Sub-committee		Karen Clausen) to present at the 11/13 meeting expanded list of CLEC impacting situations. Related to #137
115	Action	Oct 3 Meeting	SGAT Language	Revisit proposed SGAT language at the conclusion of the Re-Design process	Core Team	On-going	
116	Issue	Oct 3 Meeting	New Product Offerings	Are new product offerings brought to CMP as a Change Request?	Core Team	TBD	Will address later during CMP discussion on Product/Process.
118	Action	Oct 3 Meeting	Criteria for Deny	State the criteria for Deny (reasons why) for the CR process.	Qwest —Judy Schultz	~~Oct 16~~ Extended ~~Nov 1~~ ~~Nov 13~~ Dec 10-11	Criteria examples: Specific regulatory ruling Qwest Policy Business (e.g., Cost)
126	Issue	Oct 16 Meeting	Exception Process	What process allows CRs to be submitted less than the agreed upon timeframe for CR presentation at the upcoming CMP meeting? Will the Exception Process accommodate this situation?	Core Team	~~Nov 1~~ TBD	Language for the Exception Process and/or CR Initiation Process.
133	Issue	Oct 16 Meeting	Terms	Define "major" and "point" OSS interface releases.	Core Team	On-going	Defined under Terms o Release - Major - Point 11/29: Point release was defined. Major release needs additional work. Define "Release" as well.
137	Issue	Oct 30 Meeting	Terms	Define Changes to the OSS interfaces that may not require a CLEC to make	Core Team	On-going	Related to #110-subcommittee to expand definition

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				coding changes but may affect CLEC process or operations.			*11/29: Do a search in the Master Red Line for "Code" and/or "Non-coding" to determine whether a process is needed to address non-coding changes. Non-coding changes may not require a CLEC to make coding changes but may affect CLEC operations or processes.*
139	Action	Oct 30 Meeting	Change to An Existing OSS Interface	Propose language for maximum number of major releases for OSS interfaces, other than IMA.	Qwest —Jeff Thomps on	~~Nov 13~~ TBD	
140	Action	Oct 30 Meeting	Note	Reword "note" to accommodate weekends and holidays on all timelines as attachments to the OSS Interface elements. 11/29: Qwest to evaluate if the timelines should be in business days or calendar days.	Qwest —Judy Schultz	~~Nov 13~~ Extended TBD	Elements: • Change to An Existing OSS Interface • Introduction of a New OSS Interface • Retirement of an Existing OSS Interface
141	Action	Oct 30 Meeting	Change to An Existing OSS Interface	Define what will be included in the Technical Specifications.	Qwest —Jeff Thomps on	~~Nov 13~~ Extended TBD	
142	Issue	Oct 30 Meeting	Change to An Existing OSS Interface	Does the team agree that the CR Initiation Process and Prioritization Process have taken place before a change is implemented according to the Changes to an Existing OSS Interface Process?	Core Team	~~Nov 13~~ Extended ~~Nov 27-29~~ TBD	Qwest stated that Industry Guideline and Regulatory changes will not be prioritized, but a CR will be shared with CLECs at the Systems CMP Meeting.
143	Issue	Oct 30	EDI Implem.	Is the EDI Implementation Guideline	Qwest	~~Nov 13~~	

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#	Issue/Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
		Meeting	Guideline	under the scope of CMP?	—Judy Schultz	Extended Nov 27 29 TBD	
145	Issue	Oct 30 Meeting	OSS Interface CR Initiation	CLEC comments and Qwest responses should be communicated to CLECs. Create a method to communicate via web site.	Qwest —Judy Schultz	Nov 13 Extended Nov 27 29 TBD	
146	Issue	Oct 30 Meeting	OSS Interface CR Initiation	What are the criteria used to determine 'level of effort' (i.e., S, M, L, XL) for a release?	Qwest —Jeff Thompson	Nov 13 Extended Nov 27 29 TBD	
148	Issue	Oct 30 Meeting	OSS Interface CR Initiation	Specify/clarify process for Qwest-initiated CRs on page 1 of proposed Qwest language document.	Qwest —Judy Schultz	Nov 13 Extended Nov 27 29 TBD	
149	Issue	Oct 30 Meeting	New OSS Interface CR	Is a CR required for a new OSS interface? And would it go through the Prioritization/Ranking process?	Core Team	Nov 13 Extended Nov 27 29 TBD	
150	Issue	Oct 31 Meeting	Prioritization	Is prioritization on a per OSS interface basis?	Qwest —Jeff Thompson	Nov 13 Extended Nov 27 29 TBD	
151	Issue	Oct 31 Meeting	Redesign Core Team Expectations/ Respons.	Define level of participation for the CMP Redesign effort. In addition, provide language addressing preparedness for each working session.	Core Team Sub-committee	Nov 13 Extended Nov 27 29 TBD	Subcommittee: Leilani Hines, Sharon Van Meter, Terry Wicks 11/7: Proposed language already posted on 11/9, and ready to discuss with Core Team at a future session.
152	Issue	Oct 31 Meeting	Training	When is Training available when a new GUI is introduced (after the	Qwest —Judy	TBD	To be addressed during Training element discussion.

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				Release Production Date, or is it available with the Final Notice and User Guide?	Schultz		11/1: Ready to close with Core Team—Training will be available with the Final notice is issued by Qwest.
153	Issue	Oct 31 Meeting	Timelines	Do we need to include language that the timelines under the CMP master redlined are 'defaults'? If so, what is the language to address all timelines such as New/Retired OSS Interface?	Core Team	~~Nov 13~~ Extended ~~Nov 27-29~~ TBD	
156	Issue	Oct 31 Meeting	Admin—Notification Methods	Clarify what notices will be communicated to CLECs via email, mail-outs, communiqués, and posted on the web site.	Qwest—Judy Schultz	~~Nov 13~~ Extended ~~Nov 27-29~~ TBD	Language: Administration
158	Action	Nov 1 Meeting	CPAP/PID	What is the process to manage changes to performance reporting, calculation, etc.? How do we handle the overlaps between what is being negotiated at the CMP Redesign and CPAP-like procedures? 11/1: Status at the 11/13 CMP redesign session.	Core Team	~~Nov 13~~ Extended ~~Nov 27-29~~ TBD	CO PUC expected to issued order on Nov 5. 11/13: Becky/CO PUC provided the Team with an overview of the order.
162	Action	Nov 1 Meeting	Terms	Define "CLEC", "Qwest" and "sub-systems"	Core Team	TBD	
163	Issue	Nov 1 Meeting	CR Process	Where will a CR that impacts both an OSS interface and process be addressed—at the Systems or Product/Process CMP Meeting? We will need to develop language to address this issue.	Core Team	~~Nov 13~~ Extended ~~Nov 27-29~~ TBD	Language: Administration or CR Initiation Process

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
167	Issue	Nov 1 Meeting	Prioritization for Regulatory Change	Can Qwest revisit its position on not including Regulatory mandated changes in the Prioritization Process? CLECs understand that Qwest still opt to meet the timeline for compliance.	Qwest —Judy Schultz	Nov 13 Extended Nov 27-29 Dec 10-11	Discussion held on 11/13, but Qwest needs more time to consider CLECs comments. To be re-addressed at the next session.
168	Issue	Nov 1 Meeting	Prioritization for Industry Guideline Change	Will Qwest change its position to allow Industry Guideline changes to be prioritized through the Prioritization Process. If so, provide language to include Industry Guideline changes as part of the Prioritization Process. Suggested language: Qwest needs to be able to meet timelines where dates are mandated at industry bodies.	Qwest —Judy Schultz	Nov 13 Extended Nov 27-29 Dec 10-11	Discussion held on 11/13, but Qwest needs more time to consider CLECs comments. To be re-addressed at the next session.
169	Issue	Nov 1 Meeting	Regulatory Type of Changes	Qwest proposes to re-visit Regulatory type of change to address performance measure obligations.	Qwest —Judy Schultz	Nov 13 Extended Nov 27-29 Dec 10-11	Discussion held on 11/13, but Qwest needs more time to consider CLECs comments to not modify existing definition. Qwest to provide position after considering CLECs comments at the next session.
170	Issue	Nov 1 Meeting	CLEC-Initiated PID Change	Will Qwest consider: • a performance improvement or PIDs subject to the PAP as a Regulatory change? • a CLEC-initiated performance improvement change not subject to PAP as a Regulatory change?	Qwest —Judy Schultz	Nov 13 Extended Nov 27-29 TBD	
171	Issue	Nov 1 Meeting	IMA 10.0 Changes	What is the rationale for six (6) IMA 10.0 changes to be treated as	Qwest —Mark	Nov 9 Extended	11/19 meeting to discuss rationale. Qwest to email material and post on the

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
		11/28		Regulatory changes? Provide the details for CRs for the 5 remaining "regulatory" CRs on the IMA 10.0 list. Include supporting documentation (site the FCC order).	Routh	Nov 19 Dec 10-11	web site by 11/14. 11/30: Qwest to provide details on the CRs.
172	Issue	Nov 1 Meeting	Roles and Respons.	Review "Managing of CMP" proposal to include overall responsibilities; e.g., Qwest issues prioritization list and CLECs prioritize.	Core Team	TBD	Language: Managing the CMP
173	Issue	Nov 1 Meeting	Voting Process	Develop the Voting Process.	Core Team	TBD	
174	Action	Nov 1 Meeting	Prioritization Documents	Attach the latest Ranking Form, sample of a Release Candidate List and compilation/tabulation form to the Prioritization section of the master redline.	Qwest —Mark Routh	Nov 13 Extended Nov 27-29 TBD	Master Redline—Prioritization Process attachments
175	Action	Oct 31 Meeting	Core Team Membership	Contact those CLECs that are now dropped as a Core Team member, but may re-active their membership status.	Judy Lee	Nov 13 Extended Nov 27-29 TBD	10/31: Rhythms and Scindo will no longer participate. 11/6: Emailed Electric Lightwave, Integra, McLeodUSA, Premier and XO. Contact information not available for Level 3. Integra wants to be a member; McLeod will no longer participate. Premier will continue as a participant.
176	Action	Nov 13 Meeting	OSS Elements	Review and compare CMP red lined document to all other related documents (i.e. 18 point, OBF 2233, open issues log, CLEC issues etc.) to ensure completeness of the proposed Qwest CMP Process and make any	Core Team	Jan 11	By Jan 11 Noon Mountain time: Every Core Team member and participant to provide results of review and compare document to Jim Maher. By Jan 18: Jim Maher to send a compilation matrix with CLEC-Qwest-

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#	Issue/Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				changes that may be necessary. Identify additional for OSS Interface, Product/Process and overall elements.			Lee input to the Core Team. Individual Team documents will also be shared with the team.
177	action	Nov 13 Meeting	CMP Implem.	Draft a proposal for a formal implementation of the interim and final changes discussed within the CMP Re-Design to be discussed during the monthly CMP meetings.	Qwest —Judy Schultz	~~Nov 27-29~~ TBD	Related to #178
178	action	Nov 13 Meeting	CMP Implem	Clarify what has been agreed upon for the implementation of an interim process.	Core Team	~~Nov 27-29~~ TBD	Related to #177
179	action	Nov 13 Meeting	Product/ Process Interim CMP	What is CLEC impacting?	Core team	~~Nov 27-29~~ TBD	Refer to action #110
180	action	Nov 13 Meeting	Product/ Process Interim CMP process	What is covered under the interim process for Product/Process (i.e., Additional Testing) in terms of Qwest initiated and Regulatory changes	Qwest —Judy Schultz	~~Nov 27-29~~ TBD	
181	Issue	Nov 13 Meeting	OSS CR Prioritization Regulatory Changes	Qwest to revisit language for the definition of a Regulatory change. and the proposed prioritization process as it relates to these. Qwest asks CLECs to draft proposed language for Regulatory Changes as it is written in the Red lined document to include PID/PAP scenarios. 11/13: Qwest to consider the position of CLECs on the need to prioritize Regulatory CRs and provide its final position at the next session.	Qwest	~~Nov 27-29~~ Dec 10-11	Prioritize all (excludes production support). provide for agreed upon mandatory/industry dates. allow exception. escalation and dispute resolution procedures to be invoked as necessary. (CLEC request) CLECs agree with language for regulatory changes as it is written in the red lined document Prioritization section has to include criteria around how to rank CRs.

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#	Issue/Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
182	Action	Nov 13 Meeting	Terms	Define migration testing and new release testing, and Regression Testing, Controlled Production Testing, Interoperability Testing, SATE in the "terms" section of the red lined document	Qwest —Jeff Thomps on	Ongoing	Review SGAT and EDI Implementation Guideline for language.
183	Action	Nov 13 Meeting	CMP Gaps	Judy Lee to compare and report any gaps in mapping red-lined document to OBF 2233	Judy Lee	~~Dec 10-11~~ Jan 11	Related to #176 Include as part of Core Team matrix for Jan 22-24 session.
184	Action	Nov 13 Meeting	Issues/Action Items Log	Clarify issues and action items to better capture what the item is. Discussion that does not flush out sufficient detail should be confirmed in the appropriate meeting minutes	Core Team	~~Nov 27-29~~ Dec 10-11	Began reviewing Issues/Action Items Log for understanding and status. Will continue at next session.
185	Issue	Nov 13 Meeting	Interface Testing	Re-word language to address "Provided a CLEC uses the same connectivity option as it uses in production, the CLEC should, in general, experience response times similar to production."	Qwest —Jeff Thomps on	CLOSED Nov 27	Language added to master redline under Interface Testing.
186	Action	11/27	Test Scenarios	Are test scenarios provided separately from Tech. Specs or included? (include in Changes to Existing OSS Interfaces section and Application to Application Interface Testing Section)	Qwest — Teresa Jacobs	Dec 10-11	
187	issue	11/27	AT&T issues list	#9 from AT&T issues list (including differences due to geography and systems)	Qwest —Judy Schultz	Dec 10-11	
188	action	11/27	Production Support	Production support notification to include Qwest internal trouble ticket number	Qwest —Judy Schultz	Dec 10-11	

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
189	action	11/27	Escalation Process	Draft proposal(s) for an escalation process for technical production problems for both CLECs and Qwest	Qwest — Teresa Jacobs	Dec 10-11	Teresa may call the following for input: Leilani Hines - WorldCom Terry Bahner – AT&T Karen Clauson - Eschelon
190	Issue	11/27	Severity Level	Determine, when one CLEC is severely impacted, whether this will ever be considered a Severity 1	Teresa Jacobs	Dec 10-11	11/28: Ready to close issue with Core Team at next session. Per Teresa, CLEC will have the ability to open a severity 1 ticket if the description of the CLEC problem matches the definition of a severity 1 ticket.
191	Action	11/27	Help Desk	Validate that the Parent and children trouble tickets are linked and closed.	Teresa Jacobs	Dec 10-11	11/28: Ready to close issue with Core Team at next session. Per Teresa, If a ticket has been opened, and subsequent to the ticket creation, CLECs call in on the same problem, and the Help Desk recognizes that it is the same problem, a new ticket is not created. The Help Desk documents each subsequent call in the main ticket. There are instances when a ticket has been opened, but the system problem has not yet been confirmed. If a CLEC calls in on the same problem, but it is not recognized as the same problem, another ticket may be created. At a later time, the system problem may be confirmed. In that case, one of the tickets becomes the main ticket, and the other tickets are linked to the main

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#	Issue/Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							ticket. When the problem is closed, each ticket must be closed.
192	Action	11/27	Severity Level 2 problems	Eschelon wants to check if Qwest needs to continue trouble shooting severity level 2 problems outside of Help Desk hours of operation.	Eschelon — Karen Clauson	Dec 10-11	
193	Action	11/28	IMA 10.0 prioritization	Send out an email to the Core Team that discusses the affinity between 25001 and 30623.	Qwest — Jeff Thompson	Dec 10-11	
194	Action	11/28	IMA 10.0 prioritization	Provide an explanation as well as supporting regulatory document/s as to why the Number Pooling CR #30831 must be done in order for the system to continue to perform properly.	Qwest — Jeff Thompson	Nov 30	
195	Action	11/28	Post 10.0 PID/PAP CRs	Provide the CRs (information) for PID/PAP changes for which Qwest would want an exception to the CMP prioritization process.	Qwest-Teresa Jacobs	Dec 10-11	
196	Action	11/28	Prioritization	Provide a decision on whether to provide copies of documentation regarding prioritization and sizing.	Qwest-Teresa Jacobs	Dec 10-11	
197	Action	11/28	Prioritization	Provide the end to end development life cycle and time interval for each milestone.	Qwest-Teresa Jacobs	Dec 10-11	This timeline will provide an overview of Qwest's development cycle for further discussion on Prioritization.
198	Action	11/29		Judy to send email to product and Process employees regarding how to handle changes for the next two	Qwest —Judy Schultz	Dec 10-11	

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#	Issue/Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				weeks.			
199	Action	11/29	Documentation	Verify that the version number is on the document. (CLECs want the Version # at the front of the document.)	Qwest —Judy Schultz (Kim K)	Dec 10-11	
200	Action	11/29	Documentation	Review existing Documentation Version Control tools to see if one will fulfill the CMP needs.	Qwest —Mark Routh	Dec 10-11	
201	Action	11/29	Documentation	Meet with the Documentation team regarding holding tank and operational versions. Discuss how the history log will work with the holding tank documents.	Qwest —Judy Schultz (Kim K.)	Dec 10-11	
202	Action	11/29	Documentation	Update the Documentation History Log	Qwest —Judy Schultz (Kim K.)	Dec 10-11	
203	Action	11/29	Documentation	With the Historical log there will be a separate log for the PCAT Topical section. (drop down list)	Qwest —Judy Schultz (Kim K.)	Dec 10-11	
204	Action	11/29	Documentation	How will Qwest insure that the dot changes and holding tank changes get updated on the operational version.	Qwest —Judy Schultz (Kim K.)	Dec 10-11	

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CLOSED ISSUES and ACTION ITEMS (items in BLUE were closed at the last working session)

#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
1A	Issue	July 11 Meeting	3rd Party Provider Role	What role do 3rd Party Providers play in this re-design effort? a) 3rd Party Providers are part of the core team to re-design the process, however no 'voting' rights on behalf of themselves or the CLEC-client [Process=Yes, Vote=No] b) 3rd Party Providers are allowed to 'voice' and 'vote' as any CLEC in this re-design effort [Process and Vote=Yes] c) 3rd Party Providers are excluded from the core team [Process and Vote=No] d) 3rd Party Providers are part of the core team to re-design the process, however no 'voting' rights on behalf of themselves, but can vote on behalf of the CLEC client with an LOA [Process=Yes, and Vote=Yes for CLEC client, Vote = No for themselves]	Core Team	CLOSED July 19	DECISION: d) 3rd Party Providers are part of the core team to re-design the process; however no 'voting' rights on behalf of themselves, but can vote on behalf of the CLEC client if a Letter of Authorization is in effect. The LOA must be provided to Judy Schultz.
1B	Action	July 11 Meeting	3rd Party Provider	Core Team to conclude discussion and participants to decide on one of the	Core Team	CLOSED July 19	COMPLETED in July 19 meeting.

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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				above scenarios			
1C	Issue	July 19 Meeting	Voting	Can a CLEC represent another CLEC on Voting for CMP re-design process?	Core Team	CLOSED July 19	DECISION: Yes, if a Letter of Authorization is in place for a specific session and on specific issues. The LOA must be provided to Judy Schultz.
1D	Issue	July 19 Meeting	Voting	If a CLEC or core team member is absent, how do we handle the vote?	Core Team	CLOSED July 19	DECISION: It is a CLEC's responsibility to have a same CLEC backup, or a LOA in place with an alternate.
1E	Action	July 19 Meeting	Voting	Create a standard voting form	Qwest -- Mark Routh	CLOSED August 7	COMPLETED: Voting form created and will be included in the draft meeting minutes for 8/7-8/8 session
1F	Action	July 19 Meeting	LOA	Create a standard for LOA for topic, meeting, and date to be used during the re-design sessions.	Qwest - Judy Schultz	CLOSED August 7	COMPLETED: LOA presented, discussed and agreed upon during the 8/7 Meeting.
1G	Action	July 19 Meeting	Voting	Define rules for a quorum when a 'vote' is required	Core Team	CLOSED August 7	DECISION: - Quorum is defined as 51% of the present Core Team Members - Majority vote by present Core Team Members carries the decision
1H	Action	July 19 Meeting	Voting	Seek written permission from July 19 participants if 3rd Party Provider voting	Qwest— Mark	CLOSED August 16	Participating CLECs (SBC Telecom not available) provided permission

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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				results can be posted on the web site as part of the FINAL meeting notes.	Routh		for Qwest to include voting results as part of the FINAL 7/19 Meeting Minutes COMPLETED: SBC Telecom gives permission to publish its 7/19 voting result.
2	Action	July 11 Meeting	Baseline Document	Create a single document that inserts CLEC comments on areas for improvement in Qwest's CMP into the appropriate sections of the OBF 2233 version 2 framework	Judy Lee	CLOSED July 19	COMPLETED: A tool for the working session is posted on the web site
3	Action	July 11 Meeting	Agenda Items	Schedule agenda items/elements for future working sessions	Core Team	CLOSED July 19	COMPLETED: See schedule of working sessions on the web site
4	Action	July 11 Meeting	Working Session Location	Decide the location for September working sessions	Core Team	CLOSED July 19	COMPLETED: All sessions will be hosted by Qwest and held in Denver, CO
5	Action	July 11 Meeting	CMP Redesign Web Site	Enhance the CMP web site to include the CMP Redesign information	Qwest— Mark Routh	CLOSED July 19	COMPLETED. See CMP web site for "CMP Redesign"
6	Issue	July 19 Meeting	CMP Redesign Material	What is the process to share CMP redesign material with the CLEC community?	Qwest— Judy Schultz	CLOSED July 19	COMPLETED: Draft minutes and material will be shared with the core team participants for input. Afterwards, Qwest will finalize the minutes and post on the web site. CLECs will be notified about the posting. DECISION: Participants decided that Qwest should issue a notice referring

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#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							CLECs to the web site for meeting minutes, handouts and agenda for next meeting. The handouts will not be attached to the notice.
7A	Action	July 11 Meeting	Post CLEC Comments on Web Site	CLEC requested that Qwest post all CLEC comments on the CMP Re-design web site.	Qwest— Mark Routh	CLOSED July 19	COMPLETED: Matrix is posted on the web site
7B	Action	July 11 Meeting	Written Permission to Post CLEC Comments	Seek clearance in writing from individual CLECs to post their comments on the CMP Redesign web site.	Qwest— Mark Routh	CLOSED July 13	COMPLETED: CLECs that provided comments allowed Qwest to post on web site
8	Action	July 19 Meeting	Notice and Distribution Lists	Provide guidelines for CLEC notifications and distribution list - Ease-of-use - Comment/Reply process including web site option to comment - Contact information - Identify limitations on contact information: proprietary, open-to-participant, or open-to-all	Core Team	CLOSED August 7	COMPLETED: Established four categories for notices to facilitate notification efficiency.
9	Action	July 19 Meeting	Re-name	Do we need to rename CMP to CMP CMP to CMP? Rename co-provider to CLEC?	Core Team	CLOSED August 16	DECISION (7/19): Qwest will rename co-provider to CLEC and provider to Qwest. DECISION (8/7): Recommendation to rename from CMP to CMP will be presented at 8/15 CMP Meeting DECISION: (8/15) CLECs agreed to change CMP to CMP
10	Action	July 19	ATIS	Research what ASOG activities are	Qwest—	CLOSED	COMPLETED:

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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
		Meeting		being worked on at ATIS.	Judy Schultz	August 7	ATIS is not developing a Change Management process that includes ASRs. Related to Issue #17B.
11A	Action	July 19 Meeting	CMP Meeting Distribution Package	Determine what to include in the CMP meeting distribution packages.	Core Team	CLOSED August 8	COMPLETED: REDLINED CMP re-design framework will reflect results of discussion.
11B	Action	August 8 Meeting	CMP Meeting Distribution Package	Qwest to provide a sample of the "report" containing information for CMP meeting.	Qwest— Judy Schultz	CLOSED August 14	COMPLETED: Judy Schultz presented example report and CLECs accepted the 'report' concept.
11C	Action	August 8 Meeting	CMP Meeting Distribution Package	CLECs have a need to see one document/report containing all information (single point of reference). For example, CR/RN Logs need to include originator, title, description, history and status, so that individual CRs and RNs do not need to be included in Monthly Meeting package. CRs also need to include actual response/s and decision. Present a sample distribution package for review with updated tracking documents	Qwest— Judy Schultz	CLOSED Sep 5	DECISION: Rollout to CLEC community at the 9/19 Monthly CMP meeting. COMPLETED: Qwest presented mockup at the 9/5 re-design meeting.
12	Action	July 19 Meeting	Walk-On Agenda Items	Add walk-on item to the end of each CMP meeting agenda.	Qwest— Mark Routh, Matt Rossi	CLOSED July 19	DECISION: Qwest will add walk-on items to the end of each agenda, as appropriate, starting with the August 15 meeting
13A	Action	July 19 Meeting	CMP Web Site	Review CMP web-site and suggest potential changes and guidelines	Core team	CLOSED August 7	COMPLETED: Included in 8/8 redlined CMP framework

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
13B	Action	August 7 Meeting	CMP Web Site	Can Qwest display new naming convention on the CMP web site (CRs and RNs)—e.g., Ability to click category and receive next sub category?	Qwest – Judy Schultz/ Core Team	CLOSED August 14	COMPLETED: Closed on proposals for sub-category under the 4 categories (Systems, Product, Process and Network). Qwest is able to display naming convention on web site
13C	Action	August 7 Meeting	CMP Web Site	Provide location (link) where all notification documents are kept – Wholesale web site	Qwest – Judy Schultz	CLOSED Sep 20	COMPLETED: Jarby Blackmun shared proposed screen shots with Core Team on 9/5. Related to Items #13F, 37, 44, and 61.
13D	Action	August 7 Meeting	CMP Web Site	Add English title to all new and existing CRs posted on the CMP web site	Qwest – Mark Routh Matt Rossi	CLOSED Sep 5	COMPLETED: Matt and Mark have updated the web sites to add the requested information.
13E	Action	August 8 Meeting	CMP Web Site	Qwest to determine how to time-stamp each web site page (whenever the page is updated on the web site)	Qwest— Judy Schultz	CLOSED August 14	COMPLETED: Qwest is currently doing this today and will continue on all updated pages
13F	Action	August 8 Meeting	CMP Web Site	Develop timeframe to roll-out web site and mail-out process	Qwest – Judy Schultz	CLOSED Sep 20	Per Jarby Blackmun, Qwest is targeting early November to deploy modifications to CMP web site.
14A	Action	July 19 Meeting	Notification Process	Discuss guidelines for the notification process at the next session.	Qwest— Judy Schultz	CLOSED August 7	Refer to re-worded Action #14C.
14B	Action	August 7 Meeting	Notification Process	Explore functionality and capability of the "mail out" tool used for Product/ Process notifications.	Qwest – Judy Schultz	CLOSED August 8	COMPLETED: "Mail-outs" are not on the web site—pending closure on the categories and sub-categories from Core Team (see Item #13B)
14C	Action	Updated	Notification	Using proposed naming convention,	Qwest –	CLOSED	COMPLETED:

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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
		August 7 Meeting (7/19)	Process	build a matrix of possible combinations for RN titles.	Judy Schultz	August 14	CLECs provided upgrades to Judy Schultz' proposal. As a result of this discussion, opened Item #14D
14D	Action	August 7 Meeting	Notification Process	Take existing system, product and process notification and modify to match proposed naming convention to obtain one single naming convention for all notifications	Qwest – Judy Schultz	CLOSED Sep 5	DECISION: Qwest will adopt a single naming convention for notifications. Progress will be monitor at the Monthly CMP meetings.
14E	Issue	August 8 Meeting	Notification Process	What category (i.e., 4 category) should be used to notify CLECs of the introduction of a new product? Should Qwest send one notice addressing product and process, or two separate, but redundant notices (i.e., one for Product and another for Process but with the same content)?	Core Team	CLOSED August 8	DECISION: Qwest to send a Product notice and a separate Process notice with the same content information—redundant notices with different category and name on the subject line.
14F	Action	August 8 Meeting	Notification Process	Provide proposals for sub-categories (e.g., Product Family) under each notice category (Systems, Product, Process and Network) and links.	Qwest— Judy Schultz	CLOSED August 14	COMPLETED: Web Site modification rollout is dependent on proposal for sub-categories—see Item 14C. Presented and closed during 8/14 Re-Design meeting
16	Action	July 19 Meeting	Qwest Comments on MATRIX	Include Qwest comments on the MATRIX (OBF Issue 2233 with CLEC Comments)	Qwest— Judy Schultz	CLOSED August 14	COMPLETED: Included Qwest's proposal on the MATRIX.
15	Action	July 19 Meeting	Notice	Research source and readability of event notifications (software applications)	Qwest— Mark Routh	CLOSED August 7	COMPLETED: System outages and event notifications are now being released in a "doc" format.
17A	Issue	July 19 Meeting	Scope	Qwest expressed concern that the Scope needs further clarification. Qwest will	Qwest— Judy	CLOSED Oct 2	COMPLETED: Element revisited on Sep 18 and 20

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#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				propose language to re-visit the Scope at a future session.	Schultz		with action taken by Core Team and Qwest to further discuss on Oct 2 and 3.
17B	Issue	August 7 Meeting	Scope	Describe Qwest's position for systems and functionality supported in the current CMP process (i.e., EXACT, HEET)	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: August 14 discussion provided a definition for OSS Interfaces that includes system functionality.
17C	Action	August 7 Meeting	Scope	Dialogue on introduction and scope to seek input from CLECs to prepare for Qwest's proposal on September 20th	Qwest – Judy Schultz	CLOSED Sep 5	DECISION: Qwest will provide proposal on Sep 20 for discussion.
18	Action	July 19 Meeting	PIDs	WorldCom will provide the Core Team members with the latest PIDs for Change Management.	WorldCom Liz Balvin	CLOSED August 7	COMPLETED: Liz Balvin sent PIDs on July 20th
19	Issue	July 19 Meeting	Contact Information	Eschelon requested that contact information for all participant be included on the CMP Re-design web site	Qwest— Judy Schultz	CLOSED August 7	Request from review of 7/19 DRAFT meeting notes and material COMPLETED: All contact information now included on the Re-Design page on the CMP web site
20	Action	July 19 Meeting	Discussion Items under Issues/ Action Item Log	Eschelon requests to include on the agenda topics for discussion under Issues and Action Items Log	Qwest— Judy Schultz	CLOSED August 7	Request from review of 7/19 DRAFT meeting notes and material COMPLETED: Updated 8/7-8/8 agenda
21A	Action	August 7 Meeting	Core Team	Establishing CMP Re-Design Core Team Membership	Qwest – Judy Schultz	CLOSED August 7	COMPLETED: Reviewed Core Team membership
21B	Action	August 7 Meeting	Core Team— Meeting Quorum	Establish Core Team Quorum at the beginning of each working session	Qwest – Judy Schultz	CLOSED August 7	DECISION: Quorum determination will be added to the agenda and be

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#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							determined by attendance at each working session
22	Issue	August 7 Meeting	Core Team— Expectations	Define Expectations of Core Team Membership	Core Team	CLOSED August 7	DECISION: Core Team Expectations/ Responsibilities: - Dedicated resource to negotiate a new CMP process. - Core Team Members can be added at any time understanding the roles and responsibilities of a Core Team Member. - Core Team Members must commit to participate either in person, via conference call, or by LOA in each working session. - Core Team Membership will be revoked if 3 consecutive working sessions are missed. - Core Team member will not be allowed to vote on any issue in which they did not participate.
23	Action	August 7 Meeting	Upcoming Event Calendar	Provide an "up coming" events page on the CMP web site that includes all monthly meetings, re-design meetings and any other interim ad hoc meetings/calls	Qwest – Mark Routh, Matt Rossi	CLOSED Sep 5	COMPLETED: Calendar is on the web site.
24	Action	August 8 Meeting	CMP POC List	Establish a CMP POC list (primary and alternate POC) and post on web site	Qwest— Judy Schultz	CLOSED Oct 16	Response is quite slow from the CLEC community, therefore Qwest is calling and asking CLECs to respond with contact information. In addition, Qwest to publicize the need for POC information at the
#							

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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							Qwest sponsored CLEC Forums. 10/3:Per Jim Maher—90% complete--will go on web COMPLETED: 10/16 – on the CMP web site as CR Manager POC, Team Representative and Alternate Contact
25	Issue	August 8 Meeting	Quick Hit Fix	How should Qwest introduce some Change Management Process changes ahead of completing the re-design CMP effort?	Core Team	CLOSED August 8	DECISION: Qwest will review any proposals with the CMP re-design Core Team members before communicating at a Monthly CMP Meeting. During the Monthly CMP Meeting, Qwest will let meeting attendees know who participated in designing the Quick Hit proposal. "Quick Hit Fix" will be a standing item for the Monthly CMP Meeting agenda.
26	Action	August 8 Meeting	Meeting Minutes Review	What is the timeline for DRAFT and FINAL 8/7-8/8 Meeting Minutes and material?	Qwest— Judy Schultz	CLOSED August 8	DECISION: - DRAFT Meeting Minutes and materials (by Fri, 8/10 9am MT) - Distribute DRAFT to 8/7-8/8 re-design session participants for review (by Fri, 8/10 Noon MT) - Participants provide Matt Rossi with corrections/additions (Mon. 8/13 Noon MT) - FINAL Meeting Minutes and

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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							materials to be distributed and posted on CMP Re-design web site (by Tuesday, 8/14)
27	Action	August 8 Meeting	CMP Re-design Location	Determine location for the October, November and December re-design working session.	Core Team	CLOSED August 16	Qwest has tentatively reserved meeting rooms in Denver, Colorado DECISION: (8/16) October sessions will be held in Minneapolis, except for CMP week; November and December sessions will be held in Denver
28	Action	August 8 Meeting	Monthly CMP Meeting	Move December meeting to 12/12	Qwest—Mark Routh, Matt Rossi	CLOSED August 16	COMPLETED: Monthly CMP meeting is moved to 12/12.
29	Action	August 8 Meeting	Exception Process	Share other ILEC Exception Process with 8/14 working session participants to be used as a base.	Sprint—Sandy Evans	CLOSED August 14	COMPLETED: Sprint and AT&T brought samples.
30	Action	August 14 Meeting	CMP Web Site	Add Meeting Agenda, material, dates to web site CMP category	Qwest—Judy Schultz	CLOSED Sep 5	COMPLETED: Began with August 14 and 16 meeting minutes
31	Action	August 14 Meeting	CMP Web Site	Change category Ordering to Ordering/Provisioning and Repair to Repair/Maintenance	Qwest—Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
32	Action	August 14 Meeting	CMP Web Site	Add Raw Loop Data Tool to the IMA GUI section of web site categories for Systems	Qwest—Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
33	Action	August 14 Meeting	CMP Web Site	Add another sub-category of "Other" for systems with possible expansion later after re-visit of the scope discussion.	Qwest—Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.

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#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
34	Action	August 14 Meeting	CMP Web Site	Investigate adding back end systems to the sub categories of the Systems notifications on the web site (WFA, TIRKS, etc)	Qwest— Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
35	Action	August 14 Meeting	CMP Web Site	Add "procedures" as a sub category (2) to the Process section	Qwest— Judy Schultz	CLOSED Sep 5	COMPLETED: This is to include any joint procedures that involve both the CLEC and Qwest – e.g., repair and exchange of CLEC owned equipment
36	Action	August 14 Meeting	CMP Web Site	Add "Tariffs" as a main category in the proposed matrix	Qwest— Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
37	Action	August 14 Meeting	CMP Web Site	Investigate the possibility of housing all RNs, CRs and Training information in one location and providing multiple methods in which this information is accessed on the web site. Example, this can be a search by number or search by category	Qwest – Judy Schultz	CLOSED Sep 20	COMPLETED: Jarby Blackmun provided overview on CMP web site with search capabilities. Demo is available for CLECs on CMP web site.
38	Issue	August 14 Meeting	Notifications	Identify designated owner or point of contact for the mail outs to contact with problems – example web sites listed with in-active URLs. 9/5: Is there flexibility in the process to support CLECs on notices (e.g., Help Desk, Sales Manager)?	Qwest – Judy Schultz	CLOSED Oct 2 (Extended to Oct 17 regular CMP)	Qwest will continue to refer a CLEC to their respective Service Manager if there are questions pertaining to a notification. 9/5: CLECs need to work with their respective Service Manager, and if necessary, speak with the Service Manager's boss to clarify questions pertaining to a specific notice. 9/18: Toni Dubuque will join Oct 3 session to discuss DECISION:

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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							Toni Dubuque to discuss this issue with the CLECs at the Oct 17 CMP Product/Process Meeting.
39	Issue	August 14 Meeting	CMP Web Site	Provide screen shots of the web site to give visual representation	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: See Jarby Blackmun's Qwest Wholesale CLEC "Notices On-Line" presentation, dated Sep 4, 2001 on the CMP Re-design web site.
41	Action	August 14 Meeting	CMP Web Site	Add the Re-Design page on the CMP section of the Proposed Release Notification matrix	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
43	Action	August 14 Meeting	CMP Web Site	Investigate possibilities for displaying (posting) and sorting Sub-category 3 of the web site	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: Jarby Blackmun informed the team that search capabilities will include category, sub-category and document number.
44	Action	August 14 Meeting	Notification	Create instructions for access to web site notification	Qwest - Judy Schultz	CLOSED Sep 20	DECISION: Per Core Team, not required due to simplicity of using the modified CMP web site.
45	Action	August 14 Meeting	Voting Tally Form	Incorporate Qwest's position on the Voting Tally Form	Qwest – Judy Schultz	CLOSED August 16	COMPLETED: See Procedures for A Vote and Impasse Resolution Process (includes Voting Tally Form) on the CMP Re-design web site
46	Action	August 14 Meeting	Voting	Draft a proposal for a voting procedure and contingency dispute resolution process for dead-lock	Judy Lee	CLOSED August 16	COMPLETED: See proposed Procedures for A Vote and Impasse Resolution Process (includes Voting Tally

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							Form) on the CMP Re-design web site
48	Action	August 14 Meeting	Voting	Determine how to reach resolution within the CLEC community if impasse were to occur – present draft proposal	AT&T - Terry Bahner	CLOSED Sep 5	DECISION: CLECs will hold a conference call to achieve consensus to resolve an impasse issue.
49	Action	August 16 Meeting	Types of changes – OBF V.1	Look at other industry bodies that need to be included in type 3 changes (e.g., ANSI and ATIS)	Core Team	CLOSED Sep 20	COMPLETED: Types of Changes discussed on Sep 20.
50	Action	August 16 Meeting	Types of Changes – OBF V.1	Present change request flow chart, form, and procedures for CR handling	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: Flow chart of change request process was discussed with modifications. Qwest to make modifications (add Denied, Escalated, Deferred and Withdrawn) and present flow chart to the CLEC community at the Sep 19 Monthly CMP meeting.
51	Action	August 16 Meeting	~~Types of Changes~~ ~~– OBF V.1~~ Terms	Obtain SGAT language for 'versioning' release language. 10/16: Define 'versioning'	Qwest – Judy Schultz	CLOSED Nov 29	Pull language on OSS versioning currently in SGAT. "Versioning" will be defined in the Terms session at a later date. DECISION: The word "versioning" has been omitted from the master redline language, therefore, a definition is no longer needed at this time.
52	Action	August 16 Meeting	OBF V.1	Create language in OBF version 1 in Change to Existing Interfaces section VII. Also address 'defects.'	Qwest – Judy Schultz	CLOSED Oct 30	COMPLETED: Discussion on Change to Existing Interface completed.

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							"Defects" will be addressed during discussion on Production Support. See Action #99 to capture this item.
53	Action	August 16 Meeting	Qwest CMP Process Document	Revise Qwest CMP process document to incorporate added language and proposed changes/improvements to the overall process to provide a basis for comparison and discussion with the CMP Re-Design Core Team.	Qwest – Judy Schultz	CLOSED Nov 29	Qwest to use redlined CMP format for its proposed language 11/29: Closed, this is the ongoing effort of the CMP redesign team.
54	Action	August 14 Meeting	Meeting Minutes	Add action item verbiage to the meeting minutes as opposed to referencing the action items document	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: Began with the August 14 and 16 meeting minutes
55	Action	August 16 Meeting	Meeting Minutes Review	What is the timeline for DRAFT and FINAL 8/14 and 8/16 Meeting Minutes and material?	Qwest— Judy Schultz	CLOSED Sep 5	*COMPLETED:* – DRAFT Meeting Minutes and materials (by ~~Tues, 8/21~~ Fri, 8/24) – Distribute DRAFT to 8/14 and 8/16 re-design participants for review (by ~~Tues, 8/24~~ Fri, 8/24 COB) – Participants provide Mark Routh with corrections/additions (~~Thurs, 8/23~~ Tues, 8/28 COB) – FINAL Meeting Minutes and materials to be distributed and posted on CMP Re-design web site (by ~~Monday, 8/27~~ Fri, 8/31) Qwest extended timeline on 8/21.
56	Action	August 14 Meeting	Meeting Minutes Update	Revise August 7-8 Final Meeting Minutes to: – Change "CLEC" to "Co-Provider"	Qwest— Jim Maher	CLOSED Sep 5	COMPLETED: Refer to CMP Re-design web site for revised final meeting minutes.

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#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				in the word CMP on page 3, paragraph 4 – Correct name to "Wicks" – Correct Evans-Sprint comments to "responses to CRs are sent to the originator via email, not posted on the web site."			
57	Action	August 14 Meeting	Meeting Minutes Update	Revise July 19 Final Meeting Minutes to include the voting results on the 3rd Party Provider issue—on August 14, the last voting CLEC has given Qwest permission to publish its result.	Judy Lee	CLOSED August 21	COMPLETED: Revised Final July 19 Meeting Minutes are posted on the CMP Re-design web site.
58	Action	August 14 Meeting	Core Team Expectations	Update the document to: "New Core Team member will not be allowed to reopen a vote on any issue that has been decided on."	Judy Lee	CLOSED August 16	COMPLETED: Revised guidelines are posted on the CMP Re-design web site.
59	Action	August 16 Meeting	OBF August, 2001 Framework	Share with the re-design team the results of OBF Issue 2233 subcommittee proposal—a2v2	Judy Lee	CLOSED August 21	COMPLETED: Sent via email to all re-design participants.
60	Action	Sep 5 Meeting	CLEC Question-naire	Verify if there is an entry on the CLEC questionnaire for contact information (POC). Does the questionnaire need to include primary and secondary point-of-contact?	Qwest – Matt Rossi	CLOSED Oct 2 (Moved to general Oct 17 CMP)	Promote the importance for CLECs to provide accurate contact information at the Qwest sponsored CLEC Forum. Primary and Secondary POC information is not entries in the questionnaire. DECISION: Address this issue at the October 17 CMP Product/Process meeting.
61	Action	Sep 5	CMP	Provide an Archive on the CMP web	Qwest –	CLOSED	COMPLETED:

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#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
		Meeting	Web Site	site.	Judy Schultz	Sep 18	Archive will remain on the CMP web site
62	Action	Sep 5 Meeting	Re-design Location	Provide location, directions and names of nearby hotels for Minneapolis meetings.	Qwest – Judy Schultz	CLOSED Sep 10	COMPLETED: Information provided to all CMP re-design participants
63	Action	Sep 5 Meeting	CMP Re-design	Provide examples at the Qwest sponsored Sep CLEC Forum of what has been changed as a result of the CMP re-design effort	Qwest – Judy Schultz	CLOSED Oct 2 (Extended to Oct 17 CMP)	The Qwest sponsored CLEC Forum on September 12-13 was postponed due to the national crisis. This needs to be scheduled around the CMP re-design and monthly CMP meetings. DECISION: Toni Debuque will address at Oct 17 CMP Product/Process meeting
64	Action	Sep 5 Meeting	Denied Change Request	Allegiance to re-introduce a previously denied CR that is still needed so that Qwest can assess and CLECs to prioritize.	Qwest – Mark Routh	CLOSED Sep18	DECISION: Closed as an action item for the re-design effort, but tracked on the OSS Interface CMP action item list
65	Action	Sep 5 Meeting	Re-design Impasse Resolution Process	Obtain feedback from individual organizations on the draft proposed CLEC-Qwest Impasse Resolution Process for the re-design effort.	Core Team	CLOSED Sep 20	COMPLETED: See "CLEC-Qwest CMP Re-design Procedures for Voting and Impasse Resolution Process_09-20-2001" on CMP web site.
66	Action	Sep 6 Meeting	271 Workshop SGAT	Qwest to make presentation regarding the SGAT language and how it relates to the process structured by the Core Team.	Qwest – Andy Crain	CLOSED Oct 3	Including Item #42 Discussion held on Sep 18 and 20 with more discussion on Oct 2-3 (re-visit Scope) and prior to the November filing. COMPLETED: Qwest presented language with CLEC discussion on Oct 3

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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
67	Issue	Sep 6 Meeting	271 Workshop SGAT	Do exhibits G (CMP framework) and H (escalation process) need to be in the SGAT?	Core Team	CLOSED Oct 3	Related to Item #66 Discussion held on Sep 18 and 20 with more discussion on Oct 2-3 DECISION: Qwest will include Exhibit G (formerly known as Exhibits G and H) in the SGAT – red lined as it evolves with the re-design
71	Action	Sep 6 Meeting	Production Support Process	What is the current process for CLECs to report and Qwest to notify CLECs on production problems—what is the production support process and timeline? Where is the CLEC documentation pertaining to this information?	Qwest – Wendy Green	CLOSED Sep 18	COMPLETED: Notification distributed and posted by Tina Hubis on Sep10. Defer to Scope and Section 12 Production Support discussions according to the re-design schedule
72	Issue	Sep 6 Meeting	CR Process	What is the process if the CLEC-originator does not agree with Qwest's reply or the CR is rejected?	Core Team	CLOSED Oct 3	Addressed on Sep 18, 20 during Escalation Process and the Dispute Resolution Process with further discussion during Oct 2-3 session. COMPLETED: Escalation and Dispute Resolution Process
73	Issue	Sep 5 Meeting	Account Management	Clarify roles and responsibility of Service Managers and Sales Managers. What is the internal notification process (e.g., advanced notice before CLEC) for Service Managers on CLEC notices?	Qwest – Judy Schultz	CLOSED Oct 3 (Address at Oct 17 CMP meeting)	Subsequent to the Sep 5-6 session, Qwest requests to address this item at the Oct 3 meeting to allow the Service Management Director to participate in-person in Minneapolis. DECISION: Will address at the Oct 17 Product/Process CMP meeting

#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
74	Issue	Sep 5 Meeting	CR Process Dispute	What is the process if the CLEC originator does not agree with reply or rejected CR	Core Team	Oct 2	Duplicative of #72
75	Action	Sep 18 Meeting	Redlined Framework	Review the Red-lined working document for successive working sessions	Bahner, Clauson, Maher, Wicks	CLOSED Sep 18	COMPLETED: Jim Maher restructured the MASTER REDLINED CMP Re-design Framework based on input from Core Team members.
76	Action	Sep 18 Meeting	Escalation URL	Create URL for Escalated issues to be submitted	Qwest – Schultz	CLOSED Oct 16	Should include issue and proposed solution COMPLETED: URL for Escalation is available for issue and response.
78	Issue	Sep 18 Meeting	Escalation Posting on Web Site	What is a reasonable time frame for posting an escalation issue and response (e.g., within one business day)?	Qwest – Judy Schultz	CLOSED Oct 16	COMPLETED: Language under Escalation
79	Issue	Sep 18 Meeting	Escalation Mail-out	Can a mail-out process be established for Escalated items (issue and response)?	Qwest – Judy Schultz	CLOSED Oct 16	Qwest will send email to all CLECs once an escalation has been initiated
80	Action	Sep 18 Meeting	Escalation	Draft proposed language regarding time frames for Qwest to provide binding position on an escalated issue (e.g., 7 or 14 calendar days). Also include binding authority language.	Qwest – Judy Schultz	CLOSED Oct 3	COMPLETED: CLEC and Qwest agreed to a 7-day interval for escalated CRs and 14 days for other non-CR issues. Language reflected in the Master Redline framework.
81	Issue	Sep 18 Meeting	Escalation	During "14-day" response cycle, will Qwest continue efforts (e.g., CR) or will activity stop?	Qwest – Judy Schultz	CLOSED Oct 3	DECISION: Requestor may ask that activity stop or continue. Language reflected in the Master Redline framework
82	Issue	Sep 18	Escalation	How are CLECs notified that an issue	Core Team	CLOSED	DECISION:

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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
		Meeting		has been escalated between monthly CMP meetings?		Sep 20	CLECs will be notified via formal notice to access web site for information.
83	Issue	Sep 18 Meeting	Dispute Resolution	Does an issue have to go through the escalation process before it is goes through the dispute resolution process?	Core Team	CLOSED Oct 3	DECISION: No
84	Action	Sep 18 Meeting	Dispute Resolution	Propose language around dispute resolution ADR process. Do we want to sight specific organizations??	Andy Crain and CLEC Attorneys	CLOSED Oct 3	COMPLETED: Language reflected in Master Redline framework
85	Issue	Sep 18 Meeting	Dispute Resolution	What is the process for CLEC-CLEC consensus and the Dispute Resolution Process?	Core Team	CLOSED Oct 3	COMPLETED: Language reflected in Master Redline framework
86	Issue	Sep 18 Meeting	Dispute Resolution	~~When can~~ Why would Qwest invoke the Dispute Resolution Process?	Qwest—Andy Crain	CLOSED Oct 3	Andy can't think of anything — we should leave in anyway. Tom Dixon: Close, but keep in mind that Qwest will probably never use it
87	Action	Sep 18 Meeting	Re-design Impasse Resolution	Propose language around the CMP re-design impasse resolution process/dispute resolution process.	Qwest—Andy Crain	CLOSED Oct 3	COMPLETED: Refer to CMP Redesign Procedures on Voting and Impasse Resolution Process document on the CMP Redesign web site.
90	Action	Sep 18 Meeting	Network outage notification	Distribute notification of CLEC questionnaire with Network Outage notification option for pager notification.	Matt Rossi	CLOSED Sep 18	DECISION: An action item for the monthly CMP Product/Process
91	Action	Sep 18 Meeting	Introduction and Scope	Define "good faith" ~~and "normal CMP Process"~~ (3.4.1)	Tom Dixon /Beth Woodcock	CLOSED Nov 29	Proposed language provided to redesign via email on Nov 1. Tom Dixon provided the definition in the "Terms" document. The definition was added to the Master Red Lined document in the Dispute

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							Resolution section. COMPLETED: Language under Introduction and Scope, and Terms.
92	Action	Sep 18 Meeting	CR Process	Include in the CR Process a step for CLECs to discuss the CR after clarification process and before prioritization.	Core Team	CLOSED Nov 1	Sub-committee to create language and distribute to Core Team by Sep 27. Oct 3: Qwest to put language around these issues Oct 16: Qwest will share proposed language at the next session. Nov 1: Discussed and agreed on CR Initiation Process language.
95	Issue	Sep 20 Meeting	Parity	What is the process for discovering retail parity issues after the conclusion of the 271 workshops? 10/16: CLECs to review information on the web site and provide comments at the Oct 30-Nov 1 re-design session.	Core Team	CLOSED Nov 29	Qwest to provide checklist used by Retail to screen change proposals for potential CLEC impacting. Related to #105. 10/16 COMPLETED: This checklist is on the CMP re-design web site under Re-Design documentation. 11/29: Close issue, but Mitch will provide Judy Schultz with questions prior to discussion at a future session.
96	Action	Sep 20 Meeting	Intro – Scope	Draft proposed language for introduction and scope for the October 2 meeting	Core Team	CLOSED Oct 2	All Core Team members to share proposed language by Sep 27 with rest of members. Karen Clausen is the lead for CLEC language.

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

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#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							DECISION: Re-visit during Product/Process CMP discussions.
97	Action	Sep 20 Meeting	Types of Changes	Have legal personnel verify the intent with the proposed language around types of changes (contractual agreement) for the red lined document.	Qwest— Judy Schultz	CLOSED Oct 3	Language for Types of Changes under Regulatory DECISION: Qwest agree to remove "contractual agreement" language.
98	Issue	Sep 20 Meeting	CR Process	How many days after receipt of the CR will Qwest contact the originator to clarify CR if necessary?	Qwest— Judy Schultz	CLOSED Oct 16	COMPLETED: Language for CR Initiation
99	Action	Sep 20 Meeting	CR Process	Qwest to provide language on Production Support. Also address severity levels and defects.	Qwest— Judy Schultz	CLOSED Nov 29	COMPLETED: Qwest provided the language.
101	Action	Sep 20 Meeting	Schedule Working Sessions	Review the start time of the first day for future working sessions.	Core Team	CLOSED Oct 2	DECISION: Begin at 9am MT—refer to schedule on CMP redesign site
102	Action	Sep 20 Meeting	Schedule Working Sessions	Can Qwest provide net-meeting capability at its location to limit Core Team member travel?	Qwest— Matt Rossi	CLOSED Sep 27	DECISION: Yes – only at Qwest locations
103	Action	Sep 20 Meeting	CMP Re-design Web Site	Clean up the CMP Re-design Web Site to house the latest version of documents.	Qwest— Jim Maher	CLOSED Oct 16	COMPLETED: Archive page set up – date placed on each document
109	Action	Oct 2 Meeting	PCAT—Tech Pub Notification	Put together a snapshot view of notifications to be released going forward in order to formulate and implement an adequate interim process for CLEC notification for PCA and Tech Pub changes.	Qwest – Judy Schultz (Susie Bliss)	CLOSED Nov 29	Presented during Oct 3 re-design conference call scheduled for Oct 5 to discuss. 10/16: PCAT schedule will be posted by 10/19; Tech Pub and OSS Interface schedules will be posted by 10/26.

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

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#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							11/1: Judy Schultz provided the Core Team with a revised matrix of upcoming notifications. DECISION: Close action item. Qwest will continue to provide the revised notification matrix.
111	Issue	Oct 3 Meeting	Document	CLEC consensus on "red lining" document changes and to include a running log in front of the document highlighting the changes 10/16: Provide samples of historical change logs for Core Team to review and discussion.	Judy Lee	CLOSED Nov 29	CLECs need to see sample of red-lined document and historical change log 10/16: Sandy Evans provided Judy Lee with a sample from BellSouth. Judy Lee to share samples with the Core Team at the next session. 10/30: Samples of historical change logs were shared with Core Team and posted on the web site. COMPLETED: 11-29-01 Core Team provided input to Qwest. Related to Issues 201-203.
112	Issue	Oct 3 Meeting	Document	Provide determination on whether or not Qwest can go back and "red line" as per the committed to going forward process for document change notification and if so – how far back	Qwest – Judy Schultz (Dana)	CLOSED Oct 16 (canceled)	Duplicate item to #108 and 109
113	Issue	Oct 3 Meeting	Interim Exception Process	How do you call a special CMP meeting outside of the general CMP meeting? Re-visit interim exception process.	Core Team	CLOSED Oct 3	DECISION: Refer to Interim Exception Process on CMP redesign web site.
114	Issue/	Oct 3	CLEC Impacting	Put together internal check sheet to	Qwest –	CLOSED	Attendees include – but are not

CLEC-Qwest Change Management Re-design Working Sessions
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#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
	Action	Meeting	Check Sheet	assist Qwest in assessing whether a change is CLEC impacting

Susie to set up a meeting with the CLECs to discuss on Oct 5.

10/16: Qwest to distribute minutes from the 10/5 Susie Bliss call and to share with the re-design Core Team the check sheet at the next session. | Judy Schultz (Susie Bliss) | Oct 29 | limited to:

Allegiance
WCom
Eschelon
AT&T

10/16: Several items were stated with the idea that this list will be 'living' and will be updated as necessary. Qwest to share minutes from Oct 5 Susie Bliss call and the check sheet to determine if a change is CLEC impacting at the next session.

COMPLETED:
Meeting minutes to the Oct 5 conference call has been posted: CMP Re-design web site, titled "CMP Redesign CLEC-Qwest Conference Call Oct 5 Final Minutes – 10-29-01." |
117	Issue	Oct 3 Meeting	CMP Re-design Location	Should the team re-check the location for the Oct 30, 31 and Nov 1 redesign meeting? Does it make sense to move the meeting to Denver?	Core Team	CLOSED Oct 3	DECISION: Eschelon, Integra and Allegiance will meet in Denver (originally planned for Minneapolis). Sprint may join in Denver or via phone.
119	Action	Oct 3 Meeting	Video Conference	Can Qwest provide video conferencing capability for the CMP redesign meetings?	Qwest— Judy Schultz	CLOSED Oct 16	DECISION: Small rooms – 20 people – we got more speakers now in Denver.
120	Action	Oct 2 Meeting	Qwest's Status Report Filing	Determine what should be 'highlighted' in the Master Redline framework to show element/s discussed.	Core Team	CLOSED Oct 16	COMPLETED: Red lined master included in filing

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

Revised—November 29, 2001

#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
121	Action	Oct 2 Meeting	Qwest's Status Report Filing	Timeframe for CLEC review of Qwest's Status Report – CLEC comments to Andy no later than close of business Fri, Oct 5 – Andy Crain issues revised document by Mon, Oct 8 COB – Additional CLEC comments to Andy by Tues, Oct 9 5pm MT – Qwest files Wed, Oct 10	Core Team Andy Crain	CLOSED Oct 16	COMPLETED: Oct 2: Andy Crain shared draft Status Report with redesign Core Team
122	Issue	Oct 2 Meeting	Source of Change	How should Qwest display 'source of change' in documents?	Core Team	CLOSED Oct 3	DECISION: Show SOURCE as a identifier on mail-out letters and include all sources with details in the historical change log.
123	Issue	Oct 3 Meeting	Interim Process	Do we agree to adopt the Proposed Interim CMP CR work flow for Product and Process as language included (but not limited to) in the *Master Redlined* framework. – Want a final review of proposed redlined language	Core Team	CLOSED Oct 16	COMPLETED: Andy Crain provided a redlined document proposal for Core Team review
124	Issue	Oct 3 Meeting	Qwest's Status Report Filing	CLECs request Qwest to refer in the Status Report that the entire redlined document is an interim draft (not final but operational) until final approval by all parties has been completed.	Qwest— Andy Crain	CLOSED Oct 16	COMPLETED: Master Redlined is now noted as Interim Draft.
125	Issue	Oct 3 Meeting	Interim Process	Do the CLECs agree to adopt the Proposed Interim CMP CR work flow for Product and Process as the "interim" CMP process for CLEC originated CRs?	Core Team	CLOSED Oct 3	DECISION: Yes, and to be implemented ASAP.
127	Action	Oct 16 Meeting	CR Initiation Form	Allow an entry to provide available timeslots for Clarification Meeting	Qwest— Judy	CLOSED Nov 1	COMPLETED: Form has been updated for CLECs

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

Revised—November 29, 2001

#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
					Schultz		to provide available timeslots for the Clarification Meeting.
128	Issue	Oct 16 Meeting	CR Initation Process	When does a CR become the responsibility of the CMP community vs. the CR originator?	Core Team	CLOSED Oct 16	DECISION: A CR becomes the responsibility of the CMP community when Qwest provides a response to that CR.
129	Action	Oct 16 Meeting	Master Redlined Framework	Mark the framework as "interim draft"	Qwest— Jim Maher	CLOSED Oct 16	COMPLETED: Master Redlined document is now marked "Interim Draft"
130	Issue	Oct 16 Meeting	CR Initation Process—Product/ Process	What is the timeframe when Qwest provides a notice on a CR response and be able to post on the website?	Qwest— Judy Schultz	CLOSED Nov 1	COMPLETED: Language under interim CR Initiation Process
131	Issue	Oct 16 Meeting	Master Redlined Framework	Can the framework include Tables to clarify steps and timeframes for each process such as the BellSouth Change Control framework? 10/16: Sandy Evans will create a Table to seek consensus at the next session.	Sprint— Sandy Evans	CLOSED Nov 29	DECISION: After the Core Team baseline the entire master redline framework. the Team will decide then if tables are needed.
132	Action	Oct 16 Meeting	12-Month Development View	Review the release calendar to insure details are included for Release 9.0 and 9.1.	Qwest— Mark Routh	CLOSED Nov 29	COMPLETED: Release calendar with details on the web site
134	Issue	Oct 16 Meeting	OSS Interface Releases	How many releases will Qwest implement in a calendar year—will it implement no more than 4 major releases? And does this apply to GUI implementation?	Qwest— Judy Schultz	CLOSED Nov 1	COMPLETED: Language under Change to Existing Interfaces • Application-to-application • GUI
135	Issue	Oct 30 Meeting	Issue	What is the process for Qwest-initiated CR that are non-regulatory mandated changes?	Core Team	CLOSED Oct 30	COMPLETED: CR Initiation Process addresses both Qwest and CLEC initiated CRs that are non-regulatory changes.

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CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

Revised—November 29, 2001

#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
136	Issue	Oct 30 Meeting	Redesign Meeting Minutes	What is the timeframe CMP Redesign meeting minutes?	Core Team	CLOSED Oct 30	DECISION: • For 1-day Sessions: Qwest to provide draft meeting minutes no later than 5 business days for Core Team to review • For 2 or more days Sessions: Qwest to provide draft minutes no later than 7 business days for Core Team review • Participant Feedback: same as above • Qwest to distribute and post Final meeting minutes within 2 business days after comments are due from participants.
138	Action	Oct 30 Meeting	OBF Language	Verify if OBF intended for maximum number of major releases (e.g., maximum of 4 major releases) per calendar year applies to each OSS, or a total of 4 major releases for all OSSs combined?	ATT— Mitch Menezes	CLOSED Nov 29	Qwest proposes no more than 4 major releases per OSS interface in a calendar year. DECISION: 11/29: Qwest will limit the releases for IMA to 4 major releases per year
144	Issue	Oct 30 Meeting	Change to An Existing OSS Interface	Provide language to address the earliest conversion time to the newly IMA-EDI release is the weekend after the Release Production Date.	Jeff Thompson/ Mitch Menezes/ Beth Woodcock	CLOSED Oct 30	COMPLETED: Language under Changes to An Existing OSS Interface
147	Issue	Oct 30 Meeting	OSS Interface CR Initiation	Develop narrative to reflect actual timeline to Qwest proposed Candidate List process.	Qwest— Jeff Thompson	CLOSED Oct 30	COMPLETED: Language: OSS Interface CR Initiation Process

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

Revised—November 29, 2001

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
154	Action	Oct 31 Meeting	Qwest Considers CLEC Comments in Final Notice	Insert language pertaining to Qwest will consider CLEC comments/ concerns into the Final Notice.	Qwest— Jeff Thompson	CLOSED Oct 31	COMPLETED: Language: Introduction of a New OSS Interface.
155	Action	Oct 31 Meeting	Reformat Proposed Language	Reformat the Retirement of an OSS Interface to separate GUI language from application-to-application.	Qwest— Judy Schultz	CLOSED Nov 1	COMPLETED; Language: reformatted Retirement of an OSS Interface.
157	Issue	Nov 1 Meeting	Same Time Availability of Comparable Functionality for IMA EDI and GUI	Develop language to insure comparable functionality for IMA EDI users are available at the same time as IMA GUI users.	Qwest— Jeff Thompson	CLOSED Nov 1	COMPLETED: Language: Change to An Existing OSS Interface.
159	Action	Nov 1 Meeting	New OSS Interface	Add language: With a new OSS interface, Qwest and CLECs may define the scope of functionality introduced as part of that interface."	Qwest— Jeff Thompson	CLOSED Nov 1	COMPLETED: Language: Introduction of A New OSS Interface
160	Action	Nov 1 Meeting	OSS Interface CR Initiation Process	Add picture or listings of timeline milestones.	Qwest— Jeff Thompson	CLOSED Nov 1	COMPLETED: Language: OSS Interface CR Initiation Process
161	Action	Nov 1 Meeting	Proposed Language Documents	Provide Core Team members and participants with the redlined proposed language documents: • New OSS Interface and OSS Interface CR Initiation: Re-do timelines to align with narrative; send redlined to team (Maher by Nov 2); team to review and provide comments (by Wed, Nov 7); insert language into the Master Redlined Framework with CLEC comments (for next meeting distribution);	Qwest— Jim Maher and Core Team	CLOSED Nov 7	COMPLETED: Documents are posted on the web site.

#	Issue/Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				modify Qwest internal M&P (Schultz) • Retirement of OSS Interfaces: send redlined to team (Maher by Nov 2); insert language into the Master Redlined Framework with CLEC comments (for next meeting distribution); modify Qwest internal M&P (Schultz)			
164	Action	Nov 1 Meeting	CR Initiation Form	Update CR Form: Change "submitted by" and "submitter" to "originator" and "originated by" respectively.	Qwest— MarkRouth	CLOSED Nov 13	COMPLETED: CR Form has been updated and will be presented at the general CMP meetings on 11/14 and 11/15.
165	Action	Nov 1 Meeting	CR Initiation Form	List out ancillary products and correct "operations" to "Operator Services." Also, remove INP.	Qwest— Matt Rossi	CLOSED Nov 13	COMPLETED: CR Form has been updated and will be presented at the general CMP meetings on 11/14 and 11/15.
166	Issue	Nov 1 Meeting	Source Information for Regulatory Mandate CRs	Qwest needs to provide the source with timeline (e.g., effective date and implementation date) for Regulatory changes.	Qwest— Judy Schultz	CLOSED Nov 1	DECISION: Qwest will provide source information for Regulatory types of changes.

Future CMP Redesign Working Session Action Item Discussions - Revised 11-29-01

- Outstanding Items for Master Redlined Framework Language
  - Introduction and Scope
    - o Good Faith (#91)
    - o Timelines under the CMP are 'defaults' (#153)
  - OSS Interface CR Initiation Process
    - o Proprietary CR and Comments/Concerns (#88, 89)
    - o Criteria for a Deny CR (#118)
    - o Criteria used to determine 'level of effort' (#146)
    - o Qwest-initiated OSS Interface CRs (#148)
    - o CRs that impact both an OSS Interface and Process (#163)
    - o Review and close on CLEC Comments in the Master Redline framework
  - Changes to An Existing OSS Interface Elements
    - o "Draft" industry guideline changes (#94)
    - o CR Initiation Process takes place before Changes to An Existing (#142)
    - o Maximum of 4 major releases per calendar year per OSS (#138, 139)
    - o What is included in Technical Specifications (#141)
    - o Review and close on CLEC Comments in the Master Redline framework
  - Introduction of A New OSS Interface
    - o Review and close on CLEC Comments in the Master Redline framework
    - o Close on timeline Note language (#140)
  - Retirement of Existing OSS Interfaces
    - o Review and close on CLEC Comments in the Master Redline framework
  - Administration
    - o Re-visit the CMP Web Site (#13G)
    - o Timeframe and method that Qwest provides a notice on a CR response and post on web site (#130, 145, 156)
  - Managing the CMP
    - o Roles of representatives (#107, 172)
  - Terms (#51, 106, 133, 162, 182)

- Prioritization Process (Regulatory and Industry Guideline Changes)
- Prioritization Process (action items)
  - o Will a new OSS CR go through prioritization? (#149)
  - o Is prioritization on a per OSS basis? (#150)
  - o Qwest position on prioritizing Regulatory changes (#167, 181)
  - o Qwest position on prioritizing Industry Guideline changes (#168)
  - o Can a CLEC prioritize/rank OSS interface CR candidates, even if the CLEC is not using the interface? (COIL-WCom)
  - o Attach the latest ranking form, sample of candidate list, and tabulation form (#174)
- Revisit Types of Changes (Regulatory and Industry Guidelines #169)
- Status: Process to manage changes to performance reporting, calculations, etc. (#158, 170)
- Revisit Qwest-initiated Product/Process CR Process (#180)
- Define What Is CLEC-impacting/not CLEC-impacting (#110, 137, 179)
- Review Quick Hit Redesign Improvements (#177, 178)

Future CMP Redesign Working Session Action Item Discussions - Revised 11-29-01

- Define level of participation (CMP Redesign Core Team Expectations, #151)
- Revise the CMP Re-design "Procedures for Voting and Impasse Resolution Process" to allow provisions to invoke a vote at the current meeting, not wait until the next session
- Review and clarify ATT Issues (Mitch)
- Review and clarify WCom Issues (Susan/Leilani)
- Review Issues and Action Items Log (#184)—if time permits, otherwise review tomorrow
    - Can we archive CLOSED issues and action items?
- Review Document Historical Change Log and determine implementation date (Action Items)
- Criteria for CR Denial
- Lanaguage- Address non-coding changes that may affect CLEC operations or processes
- Retail-Wholesale Parity

Exhibit L
Provided by Mitchell Menezes
11/13/01

AT&T notes for November 13, 2001 Redesign Meeting. Items AT&T would like to clarify or raise for discussion in CMP Redesign.

A.   Points to Clarify:

1.   At redesign meetings, CLECs and Qwest identify items that need to be addressed at a later time and Judy Lee puts them on the board (paper or whiteboard). We assume that they all make it to the issues/action items log. Do they?

Would it be helpful for the note taker to transcribe all items put on the board as part of the minutes so that each item is captured there?

Another concern is whether the issues/action items log adequately captures the issues. Are they described with sufficient detail to include the context of the discussion where the issue arose so that the group knows later what the concerns were?

As part of this, we should walk through the existing CMP documentation, the OBF document, the tables of contents, the 18 point issues list from the 271 workshops, CLEC comments provided at the beginning of the redesign process or along the way, etc.

2.   When Qwest adds language to the Master Redline and we preliminarily conclude discussions on a topic, is it Qwest's intent that Qwest will then implement the revised piece of the process? How is approval obtained? What is done to notify, and gain acceptance from, the larger CMP CLEC body?

B.   Items to Add to the Issues List (or use to clarify existing issues):

3.   Regulatory CRs (IMA 10.0). Regulatory CRs still need to be discussed. A meeting is scheduled for 11/19/01 to discuss the 6 regulatory CRs Qwest identified as coming out of the CPAP proceeding. At this point, the requirements for IMA 10.0 were prioritized on 11/7/01. Packaging is scheduled for the January CMP meeting. If we agree that the CRs are not regulatory what happens after 11/19/01 with those CRs? Concern: the longer it takes to resolve the issue, the more likely it appears that Qwest will include these changes without CLEC concurrence.

Related:
a.   For regulatory or industry change CRs, originator of CR must provide specific information in the CR identifying what makes the CR a regulatory change or industry guideline change. Such information must include specific references to regulatory or court orders, legislation, industry guidelines as well as dates, docket or case number, page numbers and the mandatory implementation date, if any.

Exhibit L
Provided by Mitchell Menezes
11/13/01

b.   Need a process to debate whether a change fits as a regulatory or industry guideline change. With the information in a., CLECs will be informed to have this debate.

4.   The aggregate time it will take for a systems CR to run through the process (we commented on this in the 11/7 e-mail regarding the redesign documents that were discussed at the 10/30-11/1 redesign meeting).

Note: with a recent CR Sharon submitted, she was not contacted until the 7[th] business day (after submitting the CR) by Qwest to schedule the clarification call. We should indicate that the contact for this has to be made earlier, because the goal is to have the call within 8 business days, if the CLEC is available.

5.   Need to discuss <u>acceptance/denial</u> (Issue log #118) and <u>sizing</u> (issue log 146) of CRs. The following is from the CLEC-Qwest OSS Interface Change Request Initiation Process – Revised 11-01-01. What make this level of effort "preliminary"? This appears to all be within Qwest's discretion. How accurate can Qwest be at this point? Shouldn't there be a readout on level of effort (in writing or at CMP meeting) to describe Qwest's analysis on level of effort?:

Qwest will review the CRs received prior to the cut off date and evaluate whether Qwest can implement them. Qwest's responses will be one of the following:
- *"Accepted" (Qwest will implement the CLEC request) with position stated.If the CR is accepted, Qwest will provide the following in its response:*
  - *determination and presentation of options of how the CR can be implemented*
  - *identification of the preliminary level of effort (s, m, l, xl) required to implement the CR.*
    - *small – requires changes to only one subsystem of a single system*
    - *medium – requires changes to 2 or more subsystems of a single system*
    - *large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system*
    - *extra large – requires extensive redesign of at least one system*

- *"Denied" (Qwest will not implement the CLEC request) with basis for the denial, including reference to substantiating material.*

6.   Define in the Master Redline what it means to "walk an item on" at a CMP meeting. Does this replace clarification? Are there criteria for a walk-on (any kind of advance notice needed? Any demonstrated urgency required? does it in effect create an exception for the CR that is walked on?)? How is the timeline different for a walked-on item versus those submitted 3 weeks ahead of the meeting? Should this simply be treated as an exception?

7.   Exception Process. We need a fuller discussion and documentation of this process. What makes an item qualify as an exception? Should an exception first

Exhibit L
Provided by Mitchell Menezes
11/13/01

need to be "accepted" as an exception from the CMP group? If so, by what process?

8. We need a discussion about when an issue is appropriate for CMP and when the CLEC's Qwest account team is to handle an issue. We have had instances where we take an issue to the account team. The account team tells us to go to CMP when we don't think it is a CMP matter. How are account teams informed of the distinctions between their functions and the functions of CMP?

9. Quick process when things go wrong:

a. Qwest makes an internal change in process <u>that impacts CLECs</u> and the change has not gone through the CR process. We need to discuss a process for addressing these things. There should be a way for a CLEC to identify the problem and get a quick response from Qwest that withdraws the process change and makes it go through the CR process before Qwest can implement.

b. CLEC observes a problem on the Qwest side when CLEC submits LSRs. For example, we submit a number of LSRs with a Saturday due date. For a large group of these orders, we get a FOC for the following Monday rather than the date requested (this is where the due date CLEC requested does fit the interval for the service ordered). On our side, we see this large group and believe there is a systems or process problem on the Qwest side and want to identify the problem to Qwest as a group for resolution. Currently, Qwest will only work them one at a time. This is inefficient and provides poor customer service to CLEC and ultimately the end user. Perhaps this could be handled in a "production support" process linked to CMP for product/process (parallels to the systems side).

10. CLEC-impacting changes (Issues log #110). This needs to be put back on track. Terry Bahner sent an e-mail to Qwest on Monday (11/12/01) to lay out the history (initial meeting, supposed to have minutes, supposed to get back together – didn't), to request the Susie Bliss take the lead in bringing the subgroup together, have Qwest identify the other categories it identified, have the subgroup walk through with Qwest the same steps Qwest went through to identify other categories of CLEC impact to beef up the list. At the end come back to the redesign group with a full discussion (go through examples at redesign).

11. SCR092601 proposed by Qwest [cannot find on the web] [**Terry B. did a CR – 5582295 on this same topic, but earlier**]
Description: Allow a jeopardy notification after a FOC instead of a non-fatal error after a FOC.
SRN092601: In Qwest's response to its own CR, Qwest proposes a change to existing PIDs for PO-8 and PO-9.
At the last redesign (10/30-11/1), Qwest stated clearly that it does not want change management of PIDs dealt with in CMP. However, with this CR, Qwest proposes a change to PIDs. Are PIDs in CMP or not? We need to discuss further.

Exhibit L
Provided by Mitchell Menezes
11/13/01

Other issues associated with this CR:

a.   Qwest initiated its CR after AT&T initiated its similar CR. Qwest held a side call in late August to seek concurrence on its CR and could not speak to the AT&T CR at that time. It appears that Qwest's CR leap-frogged AT&T's. Why?

b.   At the October CMP Product meeting, AT&T's CR was discussed and was basically turned down. The next day, at the CMP Systems meeting, Qwest presented its CR and there agreed to do what Qwest wanted, but needed to be pressed by CLECs to do what AT&T has sought in the first place.

Related issue:
On November 12, 2001, AT&T received from Qwest final CR responses. One AT&T CR had to do with disconnecting the customer (being ported to CLEC) from the Qwest switch after received a message from NPAC. Qwest denied the CR citing a PID. If Qwest is going to deny CRs due to PIDs, we need to deal with PIDs in CMP too,

12.   Is Qwest going to file a status report with the state commissions in November?

13.   Has there been a discussion yet of what happens at the end of redesign? Do we all review the Master Redline and provide comments and get to where we say it is done (is this a vote)? Is there a process to send the whole thing to the entire CMP body? Once it goes to the CMP body, will there be a walk through of the document with time for questions/comments? Is there a vote at the CMP body?

14.   Clarify in the Master Redline that CRs precede changes to an interface, introduction of a new interface (and retirement?).

15.   We need to talk about addenda to release software and documentation. How is it done? How is it communicated? How is it documented? Are CLECs ever consulted?

16.   Revisit Qwest initiated Product/Process change process. There is an issue around its use after redesign is complete. There are issues around what is "CLEC-affecting". Do CLECs get to vote on "CLEC-impacting" changes?

17.   Qwest-initiated CRs. It would be good to discuss what this means. Is it exactly the same as CLECs'. Do CLECs have the ability to deny or vote down a Qwest CR?

18.   Implementation of interim processes. Qwest should come back to the Core Team at redesign meetings with questions/concerns about implementing what is agreed to in redesign. This will insure that the implementation meets both groups' expectations, resolve ambiguities and enable (and may drive) clarification of the redesigned process in the Master Redline [this should be a standing agenda item].

Subject:
       WorldCom (Liz Balvin) Comments on CMP - Checklist to address OSS Interface
Issues
   Date:
       Tue, 13 Nov 2001 09:34:50 -0700
   From:
       Tom Dixon <Thomas.F.Dixon@wcom.com>
   To:
       "'Mark Routh'" <mrouth@qwest.com>

1) Have all OBF 2233 issues been reviewed and discussed by CMP Redesign Team:
ISSUE, we want to make sure Qwest CMP meets industry guidelines.

2) Has there been a comparison of the OBF issues against Qwest previous CICMP
documented procedures (271 proceedings exhibits G/H). ISSUE, Qwest CMP must be
established collaboratively, if we only address OBF guideline issues, what happens to the
procedures Qwest employed prior to the redesign forum? Thus, all aspects of CMP must
be evaluated by the CMP Redesign Team such that all Parties believe ALL processes
have been collaboratively developed.

3) We need from Qwest timelines for when all System Interim Processes established by
the Redesign Team can be implemented. Upon implementation, CLECs can evaluate to
determine if processes are working as expected.

4) When all outstanding issues have been addressed by the Redesign Team, a final draft
CMP document must be distributed for review and final buy-in by the Redesign Team.

5) Once the CMP Redesign Team has finalized a Systems CMP, Qwest must present to
the CLEC community at large for review and buy-in. Then there is the issue of how to
proceed with Product & Process Redesign sessions. Although no Industry Guidelines for
Product & Process procedures, CLECs emphasized the need to have input to such
processes because of the impact to our business. Regulators have recognized this and so
we must be diligent in developing processes that will address our concerns. Again, we
need to have the process established collaboratively and in the end, a document such as
the Systems CMP needs to be developed in which all Parties agree on.

Thomas F. Dixon
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Denver, Colorado 80202
303-390-6206
303-390-6333 (fax)

AT&T

1875 Lawrence Street
Denver, CO 80202

To: Matt Rossi and Mark Routh

From: Donna Osborne-Miller

Date: July 6, 2001

Re: AT&T's Comments relative to a Revised CICMP Process

AT&T CICMP members have reviewed Attachment J of the CICMP distribution package
from our meeting last month.   It is our desire that this effort will be a collective one
that is communicative and collaborative among all participants. We believe an
important driver to be OBF 2233. It is a critical piece in laying the groundwork for a
change management process.

Lynne Powers has captured, in her memo to you on July 5[th], the concerns of the Co-
Provider community. Though there will be a number of issues and concerns that arise
through our work toward change in our process as it is today, there is another item that
AT&T would like to appropriately address that we did not see in Eschelon's memo; that
is a need for a dispute resolution process, to be conducted by an independent third
party.

We look forward to this opportunity to work with Qwest and the Co-Provider community
to create a process that is truly collaborative, that takes the interests of the CLEC
community into account, and that provides CLEC's with a meaningful role in the
important systems and processes that fall under CICMP.

To: CICMP Redesign Team

From: AT&T Redesign Members

Date: August 13, 2001

Re: Comments Concerning the August 7th and August 8th Meetings

AT&T submits this memo regarding our major concerns arising from last week's CICMP redesign meetings. There are essentially five areas of concern that we would like to discuss at our next meeting; they include: (i) clarifying and documenting voting requirements; (ii) defining the scope of the change management process for OSS and product or policy changes; (iii) clarifying KPMG's role in the redesign process as well as meetings; (iv) discussing Category 3 Exception changes; and (v) using CICMP as a mechanism for Qwest to demand amendments to interconnection agreements. What follows is a synopsis of our questions in regard to each of these five topics.

I)   VOTING - What are the precise rules for voting? If there are voting rules, where are they documented, and shouldn't Qwest distribute these documents to the group? We have not discussed, in any of our meetings, what happens when there is a dead-lock in the vote as between the combined CLEC vote and the Qwest vote or for votes taken between the CLECs. What are the escalation procedures in the case of deadlocks? So that we can avoid any future uncertainty, AT&T requests that Qwest and the CICMP participants discuss these questions and create documentation that clearly describes voting rights and obligations along with the resolutions to these and any other questions that arise.

II)   SCOPE- We have not seen Qwest's proposal on the "scope" of this redesign effort. As we continue to meet, it becomes clear that the scope or a purpose statement is critical to the work in which we embarking. Without this, it does not appear that we have a clear sense of direction as we move forward in creating the change management process.

III)   KPMG - We would like clarification on KPMG's role in the redesign meetings. We are unclear why KPMG is present. While we appreciate Sam's assistance with the naming convention proposal in one of last week's discussions, in fairness, KPMG's role should be at most to observe, and primarily to evaluate Qwest's redesigned end-product as opposed to creating or influencing the end-result.

IV)   CATEGORY 3 Exception Changes – Our notes reflect that Qwest would like to discuss category 3 out of order. This category deals with product, process and technical changes. We believe that it is inappropriate and premature to talk about exception changes at this point in our discussion. In particular, it is wholly inappropriate to take-up category 3 while skipping categories 1 and 2.

Because Qwest chose to discuss the CICMP process in so far as it relates to OSS first, our efforts should concentrate on completing OSS first before we jump to other topics, and in no event should we skip around in another topic.

V)   AT&T notes that when Qwest submits a Release Notification, particularly in the context of product, process and technical changes, many such notifications appear to unilaterally demand that the CLECs must adopt such changes by a date certain regardless of what their respective interconnection agreements state. AT&T believes this approach is contrary to our contract rights, and we request that the CICMP group discuss this process either now or in relation to future discussion regarding product, process and technical changes in the CICMP redesign process.

TO: Qwest CMP Re-design Team

FROM: AT&T Redesign Members

Date: September 14, 2001

Re: Comments Concerning the September 5th and 6th Re-design
Meetings

Several items came up at last week's Change Management Process re-design
meeting that concern the AT&T team. Generally, we find that Qwest has been
changing the rules of the game as this re-design has proceeded and that this
must stop in order for Qwest and the CLECs to make any meaningful progress.
We have identified some specific examples below.

1.   Re-design Documentation. From early in this process, the CLECs and
Qwest agreed that we would work from the OBF 2233 document and reflect
changes made and other agreements reached in that document. We clarified at
the August 14, 2001 meeting that the comments made in the version we were
working from should be transferred to version 1 of the OBF 2233 document and
brought to last week's meeting. That work was not done by the time we got to
the meeting last week. Qwest brought a new document entitled "CLEC-Qwest
Change Management Process" with the latest draft date of August 31, 2001,
which we had never seen. It was apparent that Qwest expected CLECs to work
from this August 31, 2001 document, which was not complete and the source of
which is not clear. Moreover, this document reflected seven "draft" dates from
9/10/99 through 5/11/01. These are all dates that precede the CMP re-design
and don't mean anything to AT&T.

AT&T's expectations are that: (a) this process will drive the preparation of
complete documentation that thoroughly describes how CICMP will work, (b) the
parties will proceed section by section through the OBF document to the greatest
extent possible and (c) Qwest will prepare this documentation and distribute
updated redlined copies of such documentation in advance of every re-design
meeting so that CLECs have the opportunity for review prior to the next re-design
meeting. It is AT&T's understanding that OBF 2233 v. 1 is the starting point for
the preparation of the necessary documentation.

2.   Re-design or Augmentation? At the re-design meeting this week, a Qwest
person, whom we understand may be a Qwest witness in the 271 proceedings,
attempted to "correct" everyone in attendance by stating that we are involved in
an "augmentation" rather than a "re-design" of the change management process.
This is curious since all of the minutes and other documentation generated by
Qwest since this process began refers to "re-design." That tells us that Qwest is

confused; not the CLECs. What we call it is perhaps not as important as what we are doing. So, from AT&T's perspective, we are in fact re-designing a process that is not collaborative, that takes too long, that is deficient, and that does not work well. This is consistent with the comments CLECs provided to Qwest in July. Qwest, by engaging in this process, clearly acknowledges this. Please let us stick with the task at hand and not confuse the issue with unnecessary changes in terminology. AT&T will continue to refer to this process, and treat it, as a re-design. We will encourage other CLECs to do the same.

3.   <u>Following the Existing Process</u>. Last week, Qwest called a meeting of a few CLECs (four, at most) to make a decision regarding an LNP issue in the Qwest product catalog. This was an issue that Qwest had not brought before the CLECs in the CMP via a change request, as is the current process. In addition, Qwest chose not to address this matter at a CMP meeting. Just the same, Qwest attempted to have the few CLECs who participated in this call vote, as if to make a binding decision for all CLECs regarding the PCAT changes. At that meeting, AT&T and Sprint clearly stated that they were not in a position to vote and expressed concern about the nature of the meeting. The fact is, Qwest went out of process to try to get a change to its PCAT approved by CLECs to serve a Qwest purpose. This has never been an option available for CLECs. When a CLEC wants to propose changes, it must submit a change request in the CMP. As Qwest knows, the same process requirement applies to Qwest. In response to Qwest's desire to define possible exceptions to the strict requirement to submit a CR, the CLECs and Qwest discussed an interim process for emergency situations. While we do not agree that the situation that arose last week fits into this category, we recognize there may be times when an emergency process may be appropriate.

4.   <u>Voting</u>. At the very first meeting held on July 11, CLECs and Qwest agreed to the guiding principle: "One vote per Corporate Entity with majority rules." This is reflected in the meeting minutes. On July 19, 2001, we conducted a vote regarding software vendors where each entity cast a single vote and the majority prevailed. Then at the August 7 meeting, July Lee wanted to "clarify" the voting. As far as the AT&T team was concerned, no clarification was needed. We understood just fine, until Ms. Lee "clarified" for everyone what Qwest meant: "One vote per corporate entity with majority rules in CLEC community and one vote for Qwest, making every effort to reach consensus." As far as AT&T is concerned, that was not a clarification, it was an outright change in the process. Apparently, even Mark Routh was confused because our attorneys have pointed out to us that in a Colorado PUC hearing, held on August 23, 2001, Mr. Routh stated under oath that CLECs each get a vote and that Qwest gets a vote with the majority prevailing. When asked the following question: "So if there are eight CLECs and then Qwest, there are nine votes and majority rules?"; he stated, "That's correct." You will note that this was sixteen days after the CMP re-design meeting where Ms. Lee made the "clarification."

● Based on the changes in position we have observed since July 11, 2001, this
team has to say that this process seems less collaborative as time goes on.
We are losing confidence in Qwest's ability to meet it's commitments.

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●

TO: Qwest CMP Re-design Team

FROM: AT&T Redesign Members

Date: October 10, 2001

Re: Comments Concerning the October 2^nd and 3^rd CMP Re-design
Meetings

This memo is a follow-up to the CMP Re-design meeting last week.

1.   Qwest Documentation (Tech Pubs, PCAT and other Product
Documentation)

        a.   Last week, we discussed an interim process for changes to Qwest
documentation. We look forward to the commencement of this process,
however, cannot recall whether Qwest stated during the meeting when the
process would start. Would Qwest please provide by the next CMP Re-design
meeting, the date on which this new process will commence (e.g., the documents
will be red-lined, the historical change log will be included and Qwest will use the
CR process when the change is CLEC-impacting).

        b.   An important part of the discussion on this topic, which has not yet
been resolved, is the process Qwest intends to follow for documents previously
modified as a result of the 271 workshops, but not distributed and noticed to all
parties in a way that allowed for a meaningful review (changes were not
identified, agreements from 271 workshops were not identified, etc.). We
understand that Qwest will provide a response to this concern by the next CMP
Re-design meeting, if not sooner.

2.   Scope of CMP

We note that the Hearing Examiner for the Colorado Public Utilities Commission
issued the report on the Colorado Performance Assurance Plan (CPAP) on
September 26, 2001. While this report is still subject to comment, we observed
that there are two references in the report that relate to CMP:

        a.   Paragraph 14.3 of the CPAP (Issue 7 in the report) indicates that
the change management process, once re-designed and in place, will be
followed to obtain approval when Qwest wishes to make any CLEC-affecting
changes to the Performance Measurement and Reporting System.

        b.   Paragraph 18.8 of the CPAP deals with CLEC or Qwest seeking to
modify a Performance Indicator Definition (PID) outside of the six-month review
process called for in the CPAP. This provision states that the Independent

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Monitor and the Commission are more likely to approve a change to a PID "if it has been approved by another forum such as the ROC or CMP (if PIDs are ultimately included within the scope of CMP)."

It seems that the CMP Re-design group should discuss these aspects of the Colorado Commission's order and come to an agreement on how to address the changes identified in paragraph a. above. With regard to paragraph b., a discussion about whether to include changes to PIDs in the CMP would be appropriate as well.

3.   Voting

At the last meeting, a couple of items came to a vote. Tom Dixon of WorldCom raised the question of whether we were following the draft Procedures for Voting and the Impasse Resolution Process that were established for CMP Re-design. It appeared that we did not strictly follow the process outlined in that document. For example, the document states:

> Participants at a working session will determine if there are any issues requiring a vote at the next working session. If there is an issue requiring a vote, the agenda for the next working session will reflect the item. In addition, the agenda will be distributed to the CLECs and posted on the CICMP Re-design web site a week in advance of the session.

eschelon
telecom, inc.

To: **Matt Rossi & Mark Routh**

From: Lynne Powers

Date: July 5, 2001

Re: **Eschelon's Comments on the Qwest CICMP Restructure**

On June 26, 2001, Qwest distributed a Proposal for restructuring Qwest's Co-Provider Industry Change Management Process ("CICMP"). Qwest requested comments by July 6, 2001. Separately, I provided to you a Memorandum, on behalf of the CLEC Forum, regarding scheduling issues and the CLEC's proposal that the Ordering and Billing Forum ("OBF") 2233 document be used as a basis for the Qwest CICMP Restructure discussion. Eschelon supports those recommendations and also provides these written comments on the Qwest CICMP Restructure.

In its cover email on June 26[th], Qwest described its five-page Proposal as a "high level" approach. Because Qwest's proposed approach is high level only, it does not provide information about the specific nature of the restructure that is sufficient to allow CLECs to discern whether the approach is a workable one. Eschelon hopes that Qwest and the CLECs will be able to work through the needed details together over the next several months to arrive at a mutually acceptable approach. Such an approach should provide sufficient detail to provide notice to participants about the process and allow smooth implementation of the restructure. The OBF 2233 document provides the kind of specific, detailed information that is needed by CLECs to understand and rely upon the process. That document and the PIDs also include the kinds of metrics that are needed with respect to CICMP. Intervals need to be established for the distribution of Qwest's change management notification and documentation, and metrics are needed to report Qwest's compliance with those intervals.

Eschelon was pleased to read in Qwest's Proposal that Qwest will begin sharing with CLECs all proposals that impact CLECs, including those initiated by Qwest, on at least a quarterly basis. In particular, more information is needed a timely basis about Qwest-initiated changes. Although Qwest's Proposal indicates that it will share these proposals "at a high-level," Eschelon believes that Qwest needs to provide sufficient detail to allow CLECs to evaluate and anticipate such proposed changes and to do so with adequate notice.

Qwest's Proposal also states that Qwest-initiated changes will be prioritized in a collaborative process. In the past, the CLECs have been asked to vote on CLEC-initiated

changes after Qwest has decided upon which of its own changes will be made and then independently set the number and size of CLEC-initiated changes that will be allowed. Therefore, although the CLECs may agree that five of fifteen issues are all top priority, Qwest may allow CLECs to select three of those five, because Qwest has already selected a number of its own changes. CLECs know little about the criteria that Qwest has used to do so. CLECs need a better understanding of the factors affecting Qwest's decisions in this regard. More information, along with an opportunity to prioritize both Qwest- and CLEC-initiated changes, will clarify this process and help ensure true, nondiscriminatory industry prioritization.

Another aspect of prioritization that should be included in the restructure is the issue of notice. Qwest needs to provide clear, advance notice of the specific issues on which carriers will be asked to vote and when the vote will occur. Intervals should be established for both CLEC- and Qwest-initiated changes for the presentation, review, evaluation, and resolution of such changes.

Generally, more notice is needed of CICMP issues. For example, the final distribution packages for the meetings often are not distributed until the evening before or day of the CICMP meetings. Qwest at times adds items to the agenda without providing adequate notice to allow interested CLECs, or the appropriate subject matter personnel from a participating CLEC, to participate. Qwest has also organized separate calls, either with specific CLECs or a group of CLECs, to address issues in more depth that were raised during CICMP. Often, such calls are poorly noticed, no agenda or list of Qwest attendees is provided in advance of the call, and no written summary or list of action items is provided after the call. Timely and effective notice is needed for issues affecting conduct of the meetings and calls, as well as substantive changes to systems and processes.

Notices will not be effective if they are not received by the proper parties. The current notice system is becoming unmanageable because of the number of notices of a wide-ranging nature that go to a general distribution list. Eschelon has asked that Qwest implement a process, which Qwest had previously announced but not implemented, of grouping notices by subject matter to allow CLECs an opportunity to designate personnel who should receive relevant notices. More work is needed in this area to ensure that effective notice is provided in a meaningful manner. Without a more manageable notice process, smaller CLECs will be unable to participate in the process, and all parties will experience inefficiencies as CLECs ask about issues that have been covered by a notice but that notice was not received by the proper party. Qwest's Proposal does not address these kinds of notice issues.

A significant change that is needed in CICMP, but not addressed in Qwest's Proposal, is the identification and accountability of executives within Qwest with ownership for following through with issues. The CICMP Managers may coordinate issues, but they cannot commit to make changes or allocate the resources to do so. Qwest should designate an executive with ownership for ensuring completion of committed activities, identify that individual, and ensure that the individual is accountable for results. It may be unclear who is responsible for an issue, the responsible person may not have either the appropriate knowledge or authority level to follow through with an issue, or the

designated person changes and the change causes delay. Ownership and commitment is needed to ensure timeliness and responsiveness.

Qwest's high level Proposal is subject to interpretation and leaves many questions unanswered. A more concrete description of the process is needed.

-----Original Message-----
From: Powers, F. Lynne [mailto:flpowers@eschelon.com]
Sent: Wednesday, September 26, 2001 2:47 PM
To: 'Schultz, Judith'
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'soytofu@pacbell.net'; 'acrane@qwest.com'; 'Mark Routh'; 'Matthew
Rossi'; 'marcia.lees@sbc.com'
Subject: Collaborative Process

    Judy,

    I would like to make you aware of four instances in the last month
in CMP (Actual or Redesign) where the CLEC's have expressed their
combined
desire for an option or a direction regarding a matter in the meeting
and
later Qwest has ignored the CLEC's wishes and unilaterally taken action
differently than agreed. If Qwest is choosing to disagree with the
CLEC's
and dictate the change then I would like to request that you at least
state
that. The four instances are as follows:

    1) Loss & Completion Reports - In a conference call held on
Friday,
September 14th, to discuss CR# 5522887 the CLEC's voted and formally
requested that Qwest put this issue on the CMP-Systems agenda and have a
technical representative available to discuss it fully vs. having
another
off-line call. This meeting was hosted by Mark Routh who actually
conducted
a roll of participating CLEC's and recorded the vote. It is not
acceptable
for you to state that you were personally not aware of this when Qwest
hosted the call. This instance in itself speaks to the problem of
having
all these separate off-line calls where no meeting notes are recorded.
By
simply ignoring CLEC's wishes stating that you did not think we would
have
time in the meeting (a meeting that ended an hour and half early), you
are
making a mockery of the CLEC wishes. In this case if Qwest disagreed
with
the CLEC's they should have stated that clearly and an impasse could
have
been dealt with prior to the meeting.

2)   October 2001 Redesign Meeting Location - We voted on the meeting
location for October meetings in August. It was discussed that Qwest
representatives would travel to Minneapolis as well. CLEC's made plans to
attend and purchased airline tickets. On Monday, September 24th, a week
before the first October meeting, Qwest sent an e-mail stating that "Due to
recent events, the Qwest team will not travel to Minneapolis for the
upcoming CMP Re-design session." Assuming that the recent events are the
national tragedies that occurred on Sept. 11th and Qwest feels it is "too
risky" to travel, the logic seems to assume that it is ok for the CLEC's to
travel but not Qwest. Once again a vote was taken in August 2001, a
national event occurred and it may have been appropriate for a new vote to
be taken but instead Qwest unilaterally decided not to travel and now we
will have half the CLEC's in Minneapolis and half in Denver.

3)   Day Long CMP Meetings - On September 19, 2001 at the CMP
meetings we discussed the difficulty of having all of these "off-line"
meetings vs. conducting substantive discussions at the regularly scheduled
meetings.   Eschelon stated it's wish to have a day long systems meeting and
a day long process meeting. Other CLEC's agreed, you asked and there were
no dissenting votes. We all left that meeting with the understanding that
was the agreement. I was told that on Thursday, Sept. 20th in the re-design
meeting that Qwest did not feel that was a decision was final and it would
be conducting a formal vote through e-mail. Once again, Qwest unilaterally
decided to this and did not state it's position openly at the time.

4)   PCAT meetings - On September 19, 2001 at the CMP meeting we
discussed the difficulty the CLEC's are having with adequate notification
and meaningful review of the revised PCATs. CLEC's stated their desire to
temporarily stop the current PCAT change process until the process was
improved to reflect CLEC comments. On September 24th Qwest stated that they
will hold a meeting on October 5th to discuss but that the conference calls
and current process would continue. Once again, Qwest agreed to something
in the meeting and subsequently changed their mind afterward.

In the future, I would hope that this will not happen again and that
if Qwest does not agree with the CLEC's it will clearly state that and we

will all know that we have an impasse issue to deal with rather than leading
the CLEC's to believe that we have an agreed upon action plan only to find
out later that Qwest has taken the liberty of changing its position.

Lynne Powers
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CERTIFICATE OF SERVICE

I certify that the original and 10 copies each of AT&T's Comments on SATE Summary Evaluation Report and AT&T's Comments on Qwest's Brief and Status Report Regarding Change Management in Docket No. T-00000A-97-0238 were sent by overnight delivery on December 7, 2001 to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and a true and correct copy was sent by overnight delivery on December 7, 2001 to:

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